

Water Quality Trading in the Pacific Northwest & California

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Today's Speakers

Introduction by Moderator – **USEPA Region 10 - Claire Schary**

Regional Approach: **Willamette Partnership – Carrie Sanneman**

State perspective - **Oregon DEQ – Courtney Brown**

Demand side - temperature: **Clean Water Services – Bruce Roll**

Demand side - phosphorus: **City of Boise – Robbin Finch**

Credit Supply side: **The Freshwater Trust – Alex Johnson**

Watershed perspective: **Sonoma Conservation District - Valerie Minton**

TMDLs in Pacific NW

- Temperature TMDLs dominate; not very many TMDLs with other tradable pollutants
- Not many Point Sources to assign Waste Load Allocations in most watersheds

	Idaho	Oregon	Washington
TOTAL TMDLS completed (since 1995)*	2,162	1,241	1,486
Temperature	787 (36%)	817 (66%)	461 (31%)
Total Phosphorus	138	13	9
Nutrients	111	3	--
Other Parameters	1,126	408	1,016

*From EPA's website "National Summary of Impaired Waters and TMDLs"

Temperature – Scale of Problem

Assessed waters for temperature and nutrients	Miles of Streams	Acres of Lakes & Reservoirs
Idaho (as of 2012) - Temperature (787 TMDLs) - Total Phosphorus (138 TMDLs)	18,494 6,016	21,740 146,576
Oregon (as of 2006) - Temperature (817 TMDLs) - Nutrients, Phosphorus (7 TMDLs)	17,253 16,077	68,021 19,803
Washington (as of 2008) - Temperature (461 TMDLs) - Nutrients, phosphorus (33 TMDLs)	783 2	60,000 21,759
California (as of 2010): - Temperature (17 TMDLs) - Nutrients, phosphorus (52 TMDLs)	17,140 5,190	616

EPA Region 10's Trading Experience

- **Idaho** projects:
 - 1998 – 2000 Lower Boise River: PS – NPS *phosphorus*
 - 2002 -2004 Mid-Snake River: PS - PS *phosphorus*
- **Oregon** projects:
 - 2002 – 2005: Clean Water Services/Tualatin River: PS – NPS *temperature*
 - 2011: City of Medford: PS-NPS *temperature*
- **Washington** projects:
 - Lots of ideas, but no projects yet

Status of State Trading Programs

- **Idaho**

- Revising Draft Water Quality Trading Guidance

- **Oregon**

- Developing new trading rule & revising Internal Management Directive on Trading

- **Washington**

- Draft Trading Guidance (outline form)

- **Alaska**

- Does not have the right drivers for trading

What We've Learned So Far

- Programs evolve in phases and requires lots of resources to launch
- State agencies are key to trading's success but reluctant to commit scarce resources
- EPA's guidance not enough and few good examples to follow
- Demand from NPDES permittees is key

Challenges for TMDLs & Trading

- Trading heightens awareness of issues with TMDL implementation
 - TMDLs can only assign enforceable load reduction to point sources (Waste Load Allocations)
 - Waste Load Allocations are based on certainty that Load Allocation will be met

Baseline is Major Trading Issue

- EPA's Trading Policy:

Baseline = Load Allocation

- States' rules define individual landowner's share of Load Allocation to meet "baseline"
- Gap may exist with what Load Allocation needs to be reduced by entire category