

Narrative Nutrient Standards: Update and Explanation of an Adaptive Management Program

Amy Steinmetz, Water Quality Division Administrator
March 15, 2022

Timeline

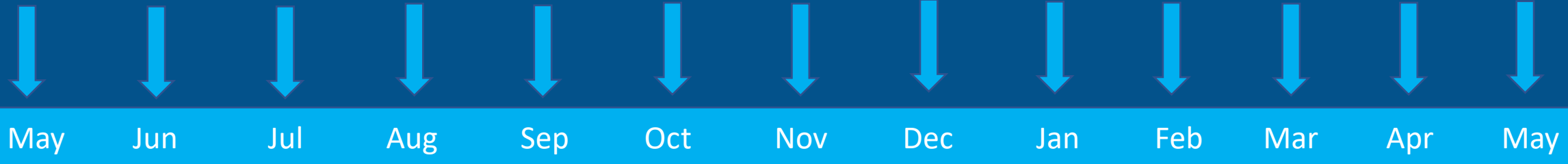
Task Force Meetings

Bi-monthly Meetings to Discuss
AMP Concerns

Draft Rule,
Circular, and
Guidance
Released ,
Comments
Received

Initiation of
Rulemaking
for
Framework
Rule

Adoption
of
Framework
Rule



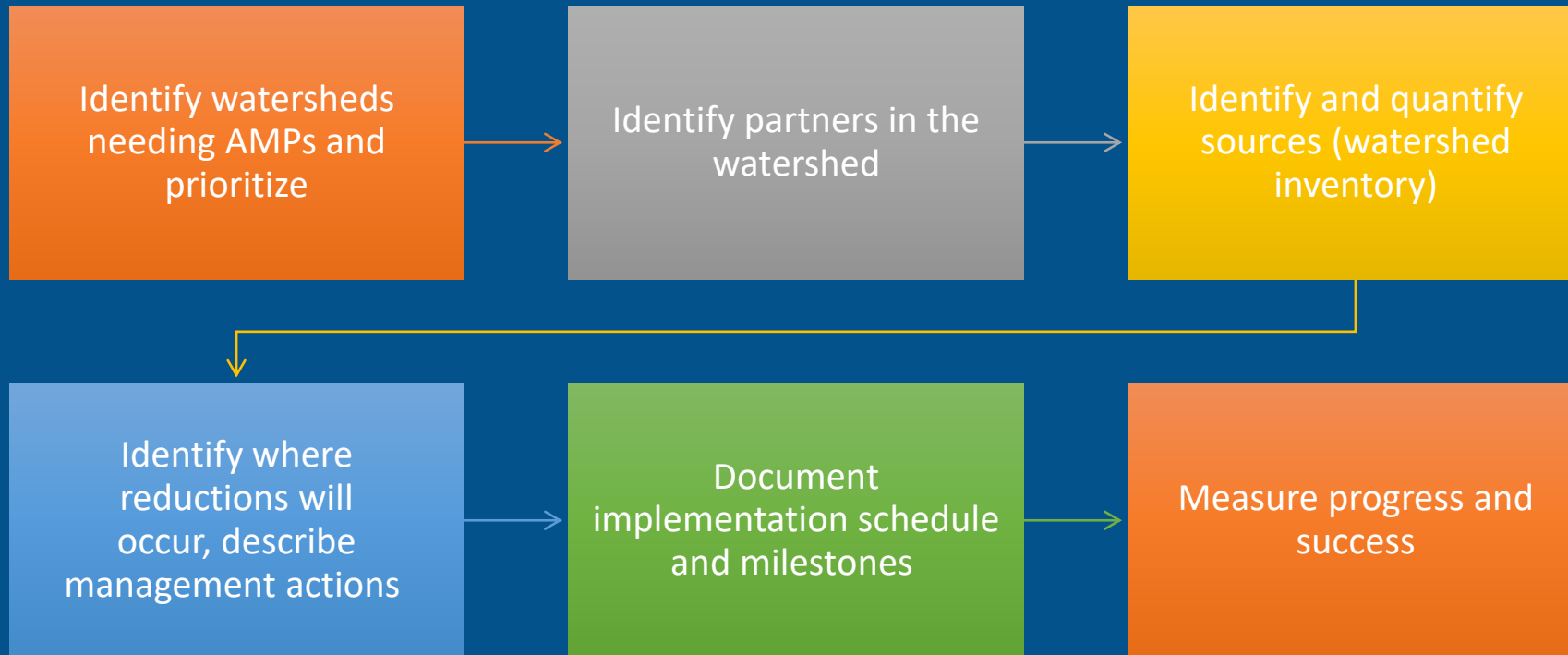
Principal Activities Discussed in 2021

Activity	Main Nutrient Work Group	Sub-committee	Complete By (6 NWG meetings planned)	Date (2021)
Discuss Key Components of Adaptive Management Program	X		Meeting 1	5/27
Work on details of Adaptive Management Program and Plans, including procedural aspects, rolling review, adaptation		X	Prior to Meeting 2	TBD
Define overall Adaptive Management Program. Initial discussion of watershed-scale framework	X		Meeting 2	6/23
Work on details of watershed-scale framework; address approach for complex watersheds containing multiple point sources or which drain to lakes		X	Prior to Meeting 3	TBD
Adaptive Management Program scale framed. Initial discussion of response variables and harm-to-use thresholds.	X		Meeting 3	7/28
Work of details of response variables, harm-to-beneficial use thresholds, where measured, how often, etc.		X	Prior to Meeting 4	TBD
Complete response variable discussion. Initial discussion of process for identifying point source long-term nutrient targets, accounting for all factors impacting waterbody.	X		Meeting 4	8/25
Work on details for identifying point source long-term nutrient targets		X	Prior to Meeting 5	TBD
Complete discussion of point source long-term nutrient targets. Initial discussion of AMP-TMDL relationship.	X		Meeting 5	9/22
Work on details of AMP-TMDL integration		X	Prior to Meeting 6	TBD
Complete discussion of AMP-TMDL relationship. Complete discussion of outstanding issues prior to rulemaking.	X		Meeting 6	10/27

What is an Adaptive Management Program?

- Watershed-scale program that protects water quality from the impacts of nutrients
 - Per SB358, prioritizes reduction of phosphorus, where appropriate, over nitrogen
 - Allows for nutrient sources to be addressed incrementally over time by incorporating flexible decision-making which can be adjusted as management actions and other factors become better understood
 - Reasonably balances all factors impacting a waterbody while considering the relative cost of treatment options, their feasibility, and their expected water quality improvement
 - Identifies specific nutrient reduction requirements
 - Goal is the protection and achievement of the beneficial uses of a waterbody

AMP Essential Components

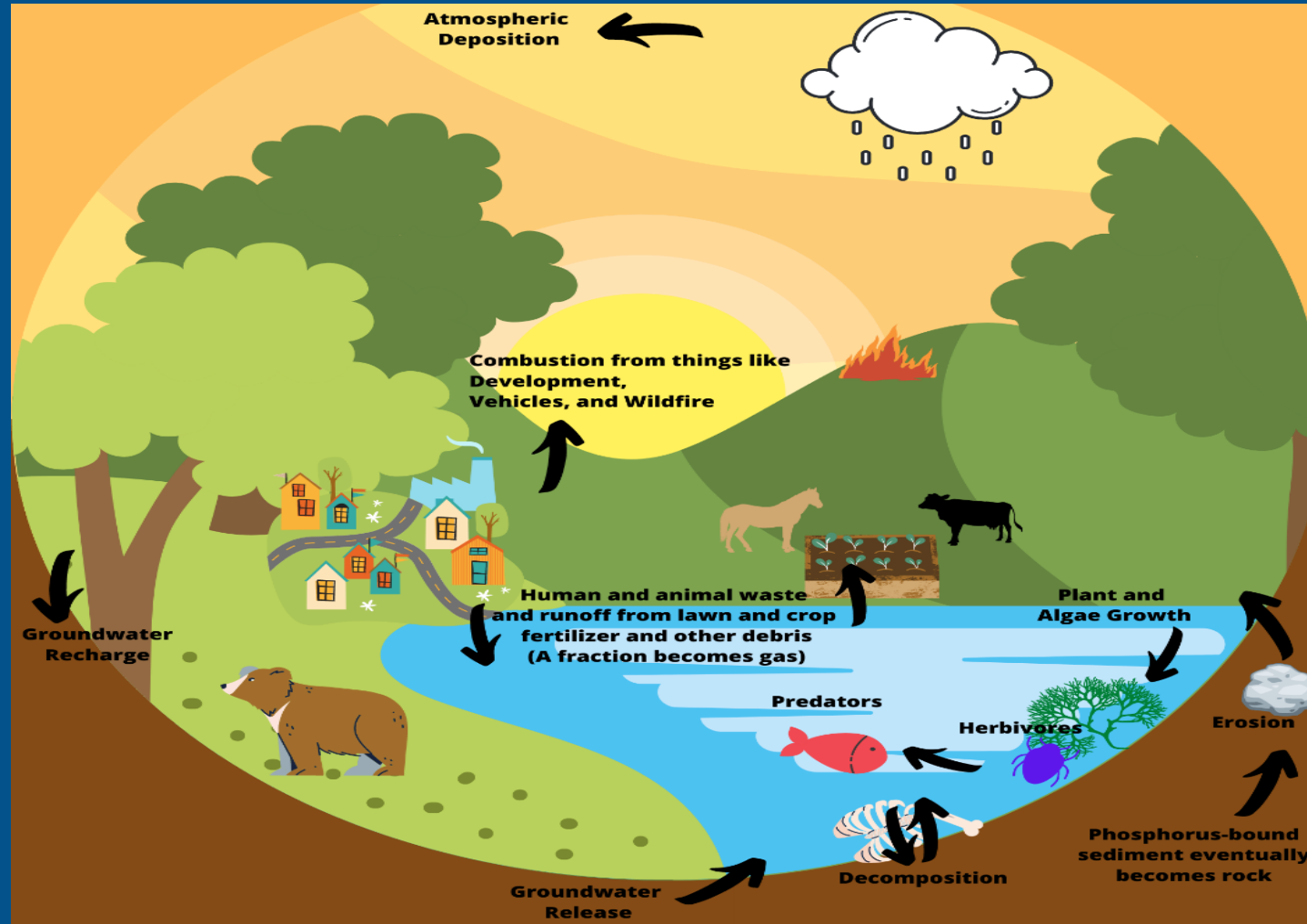


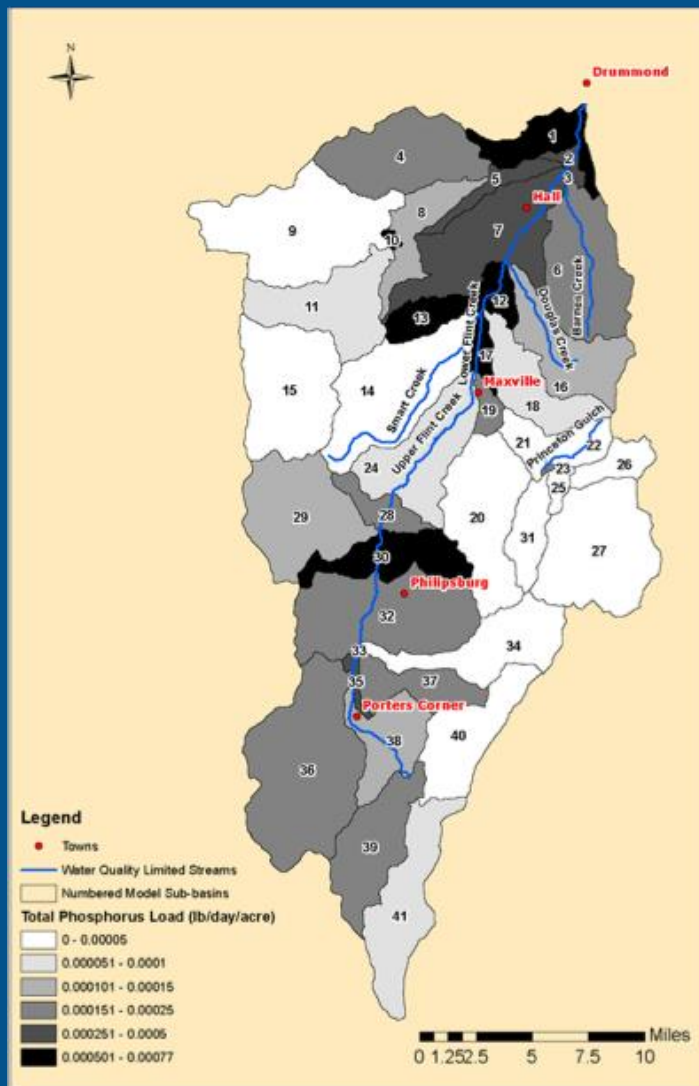
Pillars

The following guiding principles will serve as the foundation for the rulemaking process.

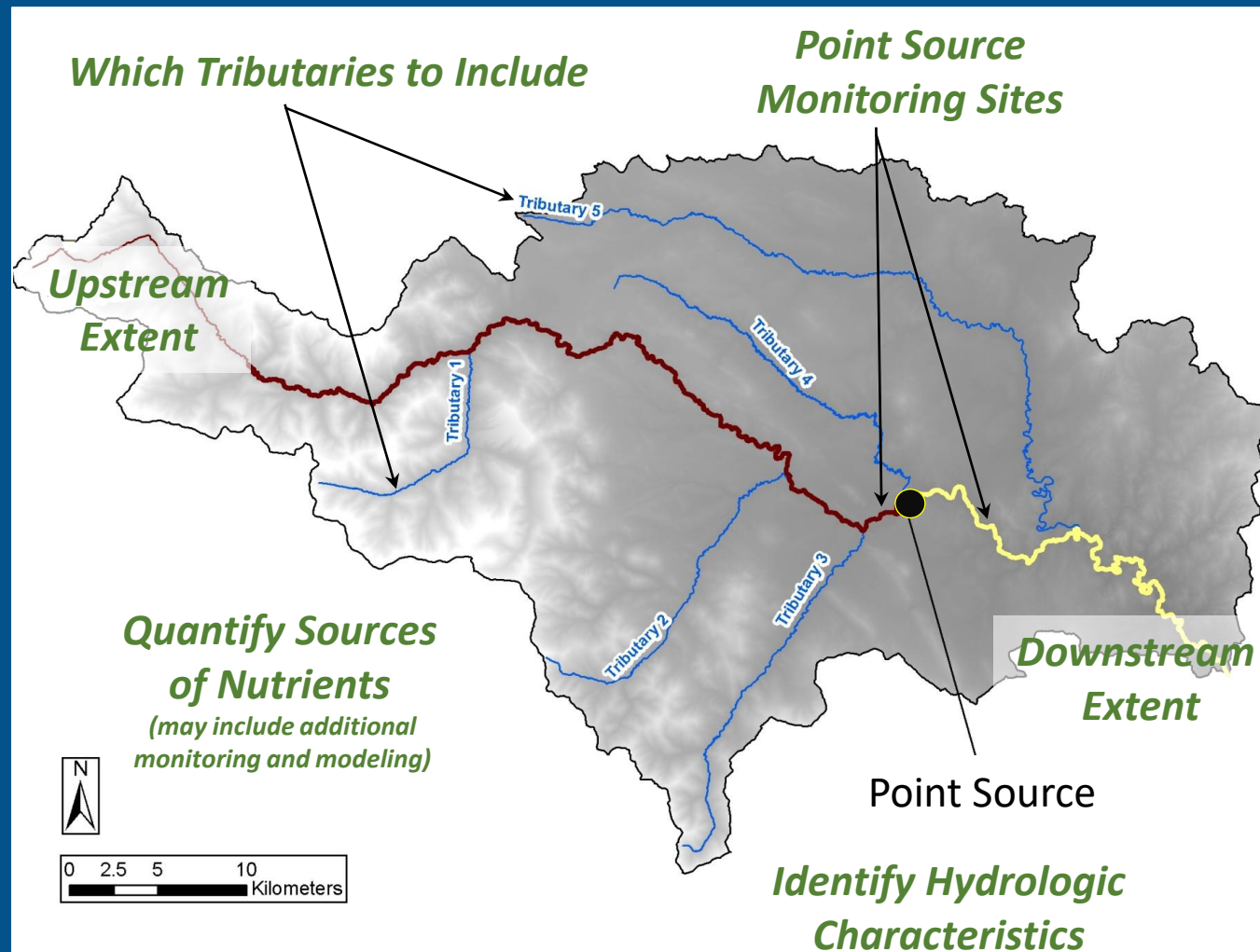
- 1 DEQ will utilize the existing science of nutrient impacts to Montana's beneficial uses—it is not the intent of these meetings to revisit the science.
- 2 DEQ will adhere to permitting requirements of anti-backsliding.
- 3 All water quality standards changes will be submitted to EPA for approval under the Clean Water Act.
- 4 DEQ will actively engage with the Nutrient Work Group as an advisory body.
- 5 DEQ's developed and vetted nutrient assessment method will remain in place, with minor changes.

Nutrient Cycling Through a Landscape





Key Considerations When Defining an AMP Watershed



Concerns to be Addressed

Topic/Issue
Concerns that effluent limits were based on response variables and thresholds
Phosphorus is first, per SB 358, where appropriate
Technical expertise/cost for small towns
Point source concerns over controlling nutrient sources at the watershed scale
Incremental approach
Concern that DEQ needs to use familiar CWA regulatory tools



Questions?

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