

WHAT GOOD ARE TMDLs?



Difficulties in communicating uncertainty

Most TMDLs can't be Cadillacs

The best TMDL is one that gets implemented

Its about improving water quality, not improving water quality modelling

WHY ARE WE HERE?

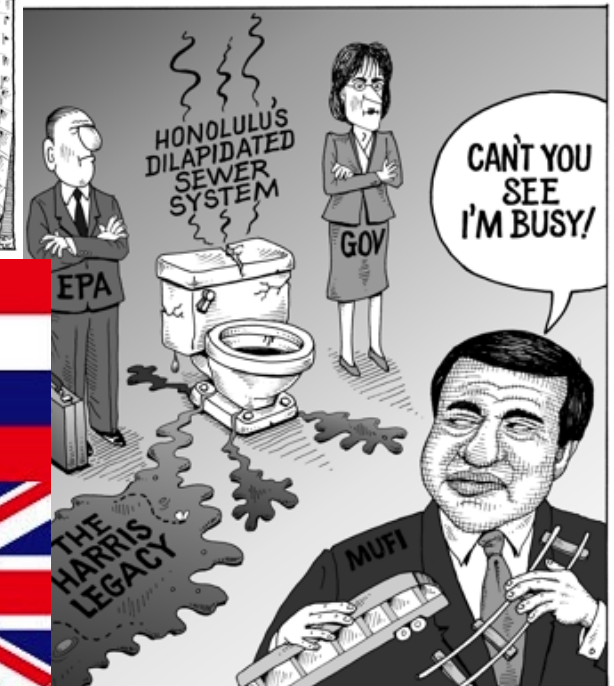
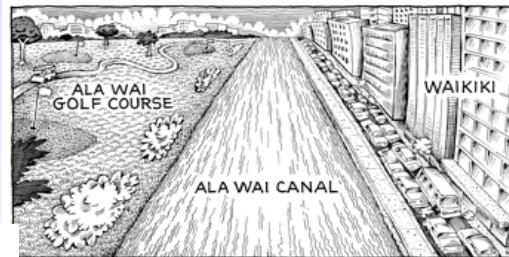
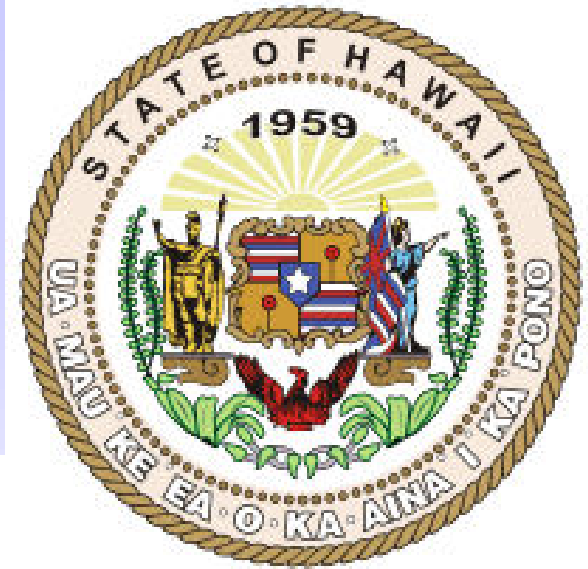
- structuring decision units, sampling plans, and data analyses for TMDL success
 - ● leveraging and herding permittees and nonpoint polluters to engage in successful all-party TMDL development
 - ● Hydraulic TMDLs - drainage flow regimes necessary for achieving water quality standards in receiving waters
 - ● NPDES permit conditions (BMPs, WQBELs, monitoring requirements) for implementing stormwater WLAs in phased TMDLs; supporting TMDL development with NPDES monitoring requirements.
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- **Residual designation authority? MS4 discretion?**
 - **Category 4 approaches for addressing degraded habitat and dewatered streams.**
 - **What is the military doing?**
 - **Fear and loathing in the agricultural sector...**

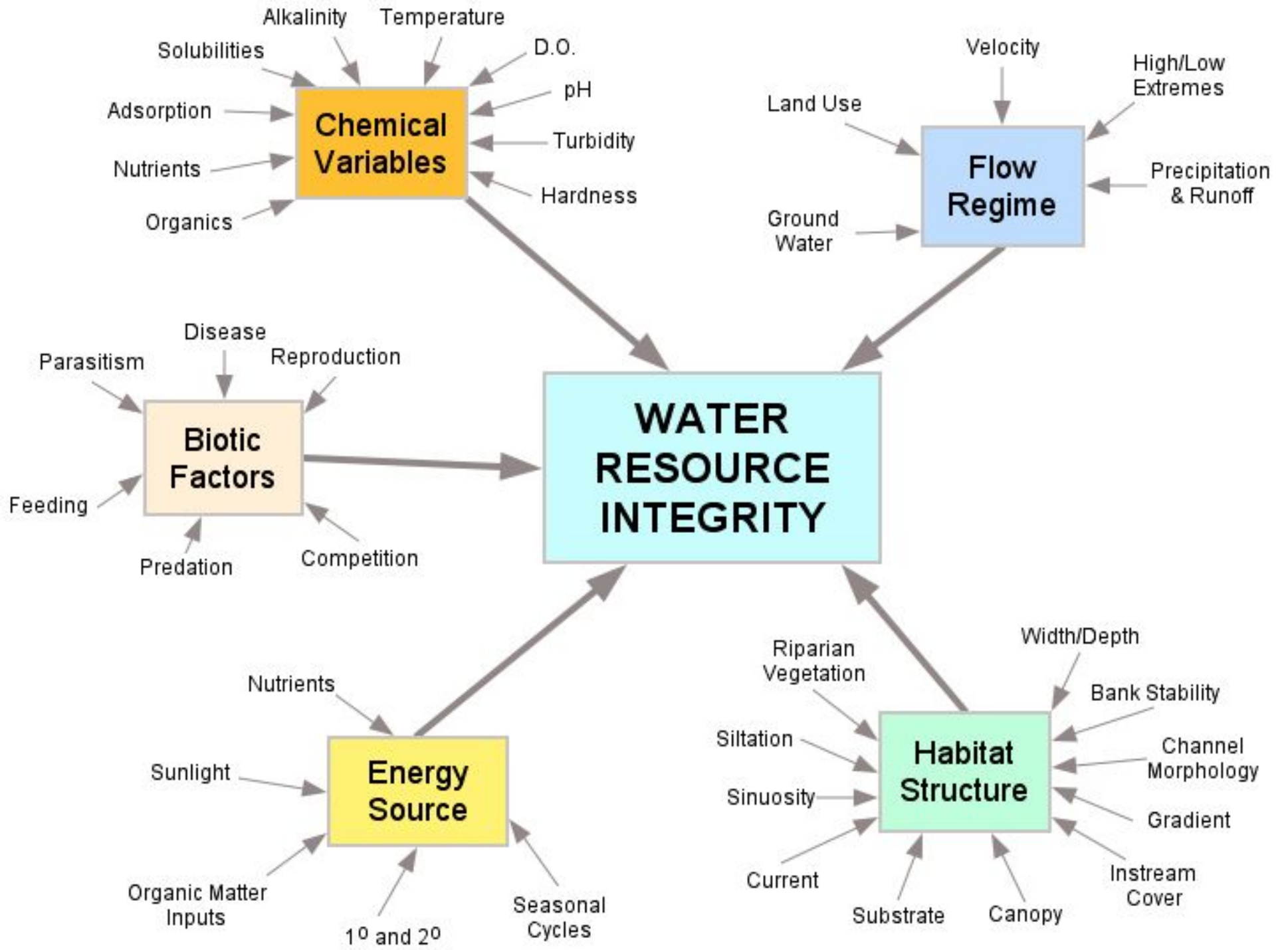
Similarities and Differences in TMDL administration across 10 EPA Regions?



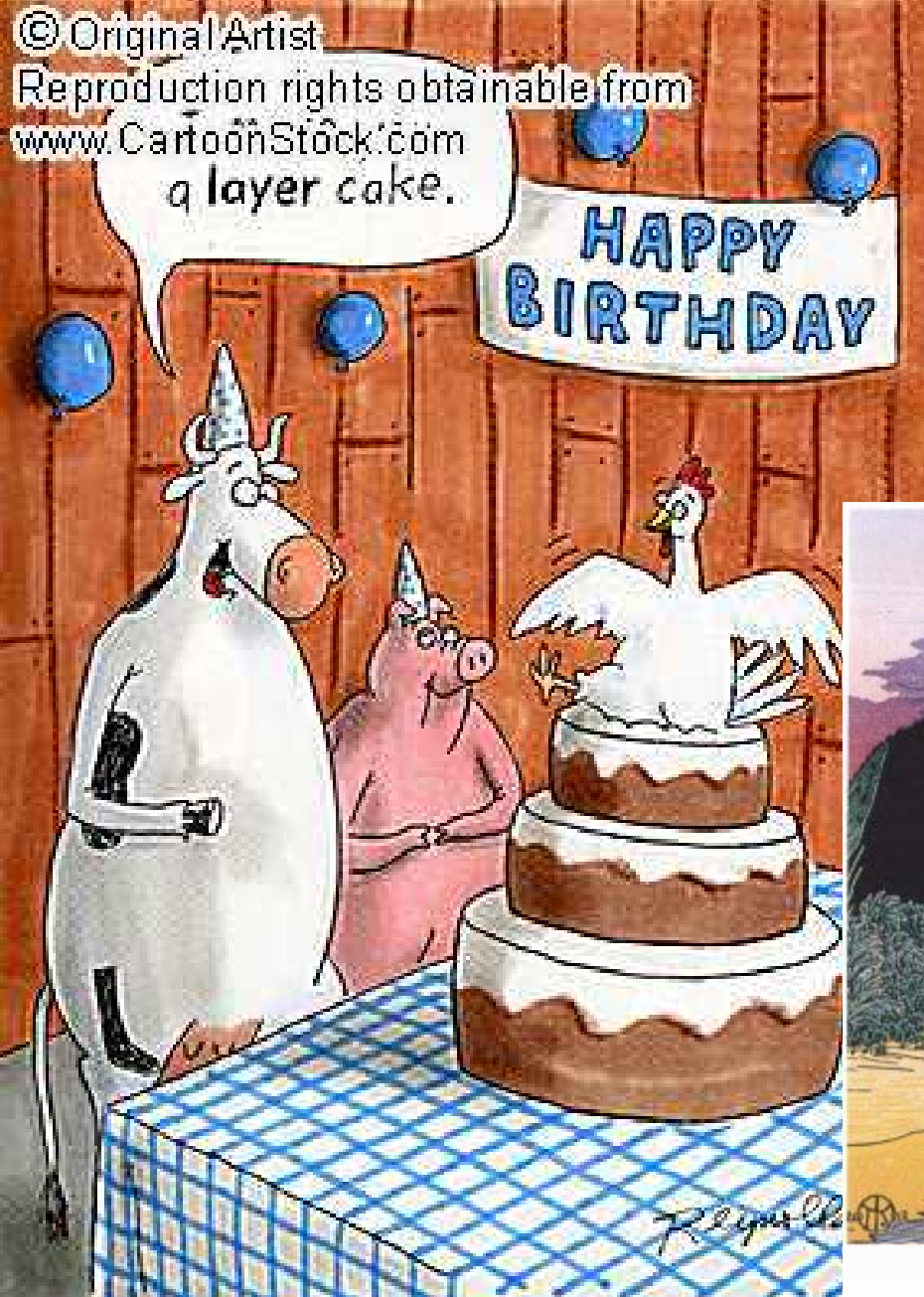
1975 Hawaii Water Resources Regional Study

- Adopt land use policies that reflect basin planning emphasis
- Use water quality protection as justification for regulating growth
- Use zoning to implement water quality





**“Communication breakdown, its always the same ...”
(Led Zeppelin)**



RIGOR

- **Average Length of TMDL, 126 pages** (n=6)
- Range from 23 (revision) to 151
- **Not including Draft Hanalei TMDLs, 301 pages**
 - (88 pages + 6 technical appendices)

PAGE

- **1973** 10 waters listed (coastal)
- **1999** Schedule for 18 waters to June 2012
- **2001** 37 waters listed
- **2006** 308 waters listed (includes single points)

Are we so focused on the map
that we neglect the territory?

TMDLs

- 2001-2007 4 waters (4/18)
- 2008 13 waters (0/18)
- 2009 9 waters (0/18)
- 2010 2 waters (0/18)

28 waters/9 years ~ 3/yr

BEANS

- 2001-2007 20 (4% done) (CNMI=0% of 2)
- 2008 +25

THE NAVY'S ACTIVE SONAR HAS NO EFFECT ON MARINE LIFE.



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