

## Lower Boise River Technical Advisory Committee for Water Quality Trading

### **ACTION ITEMS FROM March 28, 2016**

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Thank you all for another great meeting this week! Please look through the following action items. We would love responses back on the TAC action items by **April 11th**, so that we can get a revised concept draft of the updated Framework to you by **April 18th**.

**TAC Attendees:** Bill Stewart (EPA), Claire Schary (EPA), Ralph Fisher (EPA), Andy Waldera (Sawtooth Law), Jim Fronk (Secesh Consulting), Lee Van De Bogart (City of Caldwell), Nate Runyan (City of Nampa), Robbin Finch (City of Boise), Steve Hubbell (City of Boise), Kate Harris (City of Boise), Clint Dolsby (City of Meridian), Tom Dupuis (HDR), Graham Freeman (IDEQ), Darcy Sharp (IDEQ), Mark Shumar (IDEQ), Lance Holloway (IDEQ), Erica Anderson Maguire (ACHD), Liz Paul (Citizen/WAG member), Rob Tiedemann (Clear Water Partners), Justin Hayes (Idaho Conservation League), Delwyn Trefz (SWCC), Ted Douglass (Brown and Caldwell), , Mark Shumar (DEQ), Christy Meyer (The Fresh Water Trust), Neil Crescenti (Willamette Partnership), Bobby Cochran (Willamette Partnership).

**Meeting summary:** The group discussed carryover topics from the previous meeting, identifying issue recommendations, and topics that require additional discussion time at upcoming meetings. New concept topics were presented and discussed including credit characteristics, quantifying water quality benefits, managing risk and uncertainty through trading ratios, and leveraging multiple funding sources for projects and credit generation. Throughout these discussions several action items to be completed prior to the next TAC meeting were identified and are presented below along with assignments and timeframes for completion.

**Output expected from group/process:** TAC to provide feedback on concept draft of the updated Framework and to continue to progress on developing an updated draft Framework for recommendation to the WAG.

Upcoming Meeting Dates	Who	Location
April 27th, 2016, 10:30am-4pm	Technical Advisory Committee	Meridian Water Resource Recovery Facility Administration Building

Carryover concepts discussed	Discussion	Option(s) tentatively recommended
<p>SCOPE OF FRAMEWORK:                      Incorporate sediment as pollutant eligible for credit trading and create consistency with TMDL by including both total phosphorus and periphyton targets?</p>	<p>Inclusion of sediment as a pollutant for trading is feasible but will require additional time and resources that will likely extend beyond current project timeframe. All point sources are currently below permit limits for sediment and therefore no demand currently exists for credits.</p> <p>Periphyton is a target identified in the TMDL, but is more a condition of the system because it is driven by nutrients in the Lower Boise River. TMDL targets are achieved through reductions in nutrients (Phosphorus). Section 3.1.2 Avoiding localized impacts is intended to address periphyton.</p>	<p>Keep current version of Framework focused on total phosphorus. Later versions can incorporate sediment and other pollutants.</p> <p>The Surface Irrigation Soil Loss (SISL) model measures sediment reductions from agricultural BMPs. Sediment reductions from irrigation related projects types could can be reported as part of program.</p> <p>Periphyton could be added to the Trading Framework if additional scientific information is developed and incorporated into the TMDL that would allow for reduction levels to be allocated to sources (point and non-point).</p>
<p>SCOPE OF FRAMEWORK:                      Distinguishing between a trade and an offset.</p>	<p>Idaho Administrative Rule and the 2010 Framework provide sideboards for distinguishing between a trade and an offset. Reviewers recognized that a trade involves a transaction or acquisition of credits, which are formally validated and recognized within the structure of the Trading Framework and that offsets are often the actions of a single point-source.</p>	<p>Keep definitions for trades and offsets, but apply similar Framework standards to both future trades AND offsets.</p> <p>Dixie Drain is based on 20 years of project development and is therefore grandfathered as an offset.</p>

Carryover concepts discussed	Discussion	Options proposed for further consideration
<p>SCOPE OF FRAMEWORK: Sand Hollow Creek and the extent of the trading area.</p>	<p>Sand Hollow Creek was removed from the 2015 Lower Boise River TMDL Addendum for total phosphorus and drains to the Snake River.</p> <p>TAC participants noted that there is a significant phosphorus loading issues associated with Sand Hollow Creek and that the Lower Boise is part of the larger Snake River-Hells Canyon TMDL.</p> <p>Also, there was a strong interest in working on nutrient reductions in Sand Hollow,</p>	<p>Define trading area in current Framework as the Boise River, <u>but not Sand Hollow Creek</u>. Future versions of the Framework or another Framework could support trades in Sand Hollow.</p>
<p>CREDITABLE PROJECT TYPES:</p> <p>Consider projects other than on-farm and in-water treatment for non-point sources</p>	<p>Most interest in adding stormwater BMPs as a creditable project type, but TAC participants recognize that not all the necessary information pertaining to quantification, bmp efficiencies, and baseline are available at this time.</p>	<p>Indicate that stormwater BMPs are important as a placeholder, but look to add those as creditable projects in future versions of the Framework.</p>
<p>TRADING UNUSED WASTELOAD ALLOCATIONS: Can a point source on a compliance schedule trade unused allocation for meeting earlier milestones?</p>	<p>TAC members overall thought that if a point source could meet their final effluent limit, then they didn't need a compliance schedule.</p> <p>If a private entity holding a discharge permit goes out of business, is sold or otherwise ends operations and therefore is no longer discharging, the pollutant allocation returns to the State.</p>	<p>A point source needs to reduce discharge beyond its final effluent limit in a compliance schedule to generate a point-point credit.</p>

To be completed by Willamette Partnership, DEQ, and others		
Action items	Who	When
CONCEPT DRAFT FRAMEWORK: Provide feedback on concept details presented in the Framework based on discussions of March 1 TAC meeting.	TAC participants	TAC to have written feedback to Willamette Partnership by April 6 <sup>th</sup> .
TRADING UNUSED WASTELOAD ALLOCATIONS: Provide options regarding the definition of point source to point source trading and unused allocations. In particular, distinguish between an “action” such as technology installation that reduces below an effluent limit, vs. ending a discharge or having too high of an effluent limit in the first place.	Justin Hayes (ICL), Lance Holloway/Graham Freeman (IDEQ)	WP to convene call. Draft options by April 18 <sup>th</sup> and presented at April 27 <sup>th</sup> meeting.
BASELINE: Need assistance defining what “demonstrating progress” is in terms of baseline. Review previously proposed BMP options presented to WAG. Draft options for discussion with EPA and presentation to TAC.	All TAC to think about some ideas. Willamette Partnership to work with EPA	To be presented in action items session of April 27 <sup>th</sup> meeting.
BASELINE: Defining what suites of practices (e.g., soil and moisture monitoring) are commonly associated with the creditable agricultural BMPs and conservation plan implementation.	Willamette Partnership, Delwyn Trefz (SWCC), Ralph Fisher (EPA)	WP to convene call by April 8 <sup>th</sup> .
BMP EFFICIENCY RATES AND UNCERTAINTY: Review literature and reports to update/verify BMP efficiency rates. Include review of nutrient management as a creditable BMP.	Willamette Partnership (talking to Ralph from EPA and ARS), the Freshwater Trust	To be incorporated into concept draft Framework and distributed to TAC by April 18 <sup>th</sup> .
SISL JUSTIFICATION: Provide justification/citation for model assumptions regarding two pounds of TP for every one ton of sediment.	Willamette Partnership (talking to USGS , ARS, TFT), TAC	To be summarized in memo by WP by April 6 <sup>th</sup> . Feedback from TAC by April 13 <sup>th</sup> . To be incorporated into concept draft Framework and distributed to TAC by April 18 <sup>th</sup> .

Action items	Who	When
<p>QUANTIFICATION METHODS: Review list of creditable project types and identify where SISL is feasible and appropriate, and where other methods may be recommended.</p>	<p>Willamette Partnership</p>	<p>To be incorporated into concept draft Framework and distributed to TAC by April 18<sup>th</sup>.</p>
<p>CREDIT LIFE: Review creditable project types and categorize practices related to surface irrigation. Propose credit life by project type.</p>	<p>Willamette Partnership</p>	<p>To be incorporated into concept draft Framework and distributed to TAC by April 18<sup>th</sup>.</p>
<p>AVOIDING LOCALIZED IMPACTS: Make sure the Framework is clear enough on permit review criteria for localized impacts with trades. The Framework includes some. Are these the right ones? Enough detail? Draft paragraph to capture previous discussions around periphyton and localized impacts as it pertains to the Lower Boise River and its watershed dynamics. Could look at Dixie Drain for information and monitoring data. Wasteload allocations are currently consistent with avoiding localized impact analysis as part of TMDL.</p>	<p>Willamette Partnership, City of Boise, Lance Holloway (IDEQ), Bill Stewart (EPA)</p>	<p>Draft paragraph to WP by April 11<sup>th</sup>. WP to incorporate into revised concept draft Framework for distribution to TAC by April 18<sup>th</sup>.</p>
<p>TRADING RATIOS: Look at the concept in the Framework and give us some feedback on the structure and #s in the Ratios section. We know Dixie uses 1.5:1. We know most trading programs use 2:1. We know 1:1 doesn't pass the net environmental gain test for some, and we know 4:1 rips up the economics for point sources.</p> <p>We talked about taking the 1.2:1 for net environmental gain and using that to "demonstrate progress" toward baseline. We talked about ways to reduce the 2:1 uncertainty ratio by project type</p>	<p>All TAC</p>	<p>Willamette Partnership will revise language to recognize that delivery/attenuation is not zero, but is not currently well understood and therefore captured in the uncertainty ratio.</p> <p>To be incorporated into concept draft Framework and distributed to TAC by April 18<sup>th</sup>.</p>
<p>PUBLIC CONSERVATION DOLLARS: We didn't get a chance to talk about this too much, but we really want some feedback on that section of the Framework.</p>	<p>All TAC</p>	<p>To be incorporated into concept draft Framework and distributed to TAC by April 18<sup>th</sup>.</p>