

<b>Title_of_proposed_action</b>	<b>CWA/SDWA Nexus Workgroup</b> (this is an existing workgroup, not a new proposal)
<b>Sponsor_entity</b>	City of Thornton
<b>What_is_action_being_considered</b>	Exploring ways to integrate permitting and find better ways to manage water quality.
<b>Why_is_action_considered_now</b>	public health, environmental protection/restoration, technical, policy, etc.
<b>Interested_affected_entities</b>	N/A. There is no specific proposal at this time.
<b>When_is_action_proposed_to_begin</b>	There is no specific proposal at this time.
<b>Estimate_monthly_or_annual_meetings</b>	4
<b>Monthly_or_Annual_Choice</b>	Annual
<b>How_will_action_be_implemented</b>	Unknown at this time.
<b>How_will_results_be_determined</b>	Unknown at this time.

<b>Title_of_proposed_action</b>	<b>MS4 Issues Forum</b>
<b>Sponsor_entity</b>	Colorado Stormwater Council
<b>What_is_action_being_considered</b>	The MS4 issues forum hopes to continue discussion with the Water Quality Control Division on a number of issues: 1. MS4 permit renewal process, 2. Nutrients (as the triennial review of Reg. 85 approaches), 3) Compliance assistance, 4) Policy vs Guidance vs Regulations, 5) Fee bill follow-up
<b>Why_is_action_considered_now</b>	Phase II MS4 permit renewal and upcoming non-standard and Phase I permits to be renewed soon, fee bill stakeholders meetings proposed in late summer/early fall 2015
<b>Interested_affected_entities</b>	MS4s, HBA and businesses engaged in construction. Support.
<b>When_is_action_proposed_to_begin</b>	August 2015
<b>Estimate_monthly_or_annual_meetings</b>	4
<b>Monthly_or_Annual_Choice</b>	Annual
<b>How_will_action_be_implemented</b>	Meetings were suspended in 2013 after comments were submitted on the first draft of the Phase II permit. Meetings should resume now that the second draft of that permit has been issued for public comment.
<b>How_will_results_be_determined</b>	Hope to reestablish the cooperative approach achieved by the original work group.

**Title\_of\_proposed\_action**

**Basic Standards Work Group**

**Sponsor\_entity**

Water Quality Control Division

**What\_is\_action\_being\_considered**

A work group is in progress and should continue during 2015 to discuss issues before the Basic Standards rulemaking hearing in June, 2015. Discussions are ongoing on the following topics.

- 1 - Use Protected designation for effluent dependent/effluent dominated waters - EPA disapproved this 2010 revision to the Basic Standards and the workgroup needs to talk about possible fixes.
- 2 - Point of application for arsenic and nitrate water supply standards (EPA Disapproval Issue) - EPA disapproved this 2010 revision to the Basic Standards and the workgroup needs to talk about possible fixes.
- 3 - Molybdenum agriculture standard (EPA Disapproval Issue) - EPA disapproved this 2010 revision to the Basic Standards and the workgroup needs to talk about possible fixes.
- 4 - Methylmercury, fish tissue-based human health table value (304(a)) - The Division uses this value in the Fish Consumption Advisory program and it needs to be in the Basic Standards.
- 5 - Arsenic water plus fish human table value - We have state-wide temporary modifications of the 0.02 ug/L value and have committed to working on resolving the uncertainty in the 2016 Basic Standards process.
- 6 - Water Supply Iron, Manganese, Sulfate, Chloride (WS standards and antidegradation) - There are compliance issues with effluent limits derived from these standards. These CWA standards are based on SDWA secondary levels (set to protect taste, color and odor). The group will explore alternatives including using a narrative.
- 7 - Temperature: Definition of Existing Quality - Changes in the definition would resolve inconsistencies within the Basic Standards and support consistent implementation between Assessments and Permitting.
- 8 - Temperature: Shoulder Season Implementation - The current abrupt change from winter to summer standards does not reflect the natural seasonal pattern and sometimes is a challenge for compliance. The group will explore alternatives that would allow a more flexible approach.
- 9 - Temperature: acute values for the winter season - Is there a possibility to adjust warm water winter acute standards to a "use protective" value? It is currently 1/2 the summer acute value.
- 10 - Antidegradation: Outstanding Waters –flexibility for remediation activities - Adding a provision that allows for short term degradation as part of a larger remediation project would clarify that such projects can be done in OW.
- 11 - Antidegradation: Reviewable baseline date - For segments that became reviewable after 2000, it would simplify matters if the baseline date for antidegradation

review were set to the date it became reviewable.

12 - DSV Alternative effluent limits language - There is a problem with the wording about WQCC setting “alternate effluent limits” that was identified in the October 2013 Policy AAH. This should be fixed.

13 - Review of Sect. 31.14 “Implementation in Discharge Permits” - Many of the provisions in Reg #31 are redundant with provisions in the Permit Rules (Reg #61) or are no longer appropriate. The group will identify opportunities to reduce redundancy.

14 - General Clean Up: typos; 31.11, footnote 5 PQLs, Delete Type “C” temp mod, etc. - General cleanup.

15 - More guidance about Site-Specific Standards, including SSS ephemeral and intermittent streams - More guidance is needed to insure consistency and improve the “approvability” of site-specific standards proposals.

16 - Warm Water Temperature Standards Temperature Sector-Based Variance - There are compliance issues with effluent limits derived from these standards. ). The group will explore alternatives.

17 - Iron Pre-filtration Methodology - Exploration of an alternative method for Iron (for aquatic life) for use in locations exhibiting high TSS related to spring snowmelt, in non-acid mine drainage waters.

18 - Molybdenum Human Health - This issue was not resolved in the Reg #33 rulemaking and identified by the Commission as needing resolution in the Basic Standards. Potential new topics: Issues that arose during the So Platte Rulemaking - Temporary Modifications at “current condition”, How do we treat “all tribs” segments, others?

<b>Why_is_action_considered_now</b>	The federal rules and the Colorado Water Quality Control Act require periodic review of water quality standards regulation and the Basic Standards (Regulation #31) are up for review in 2016. This is the opportunity to take care of housekeeping/clarification type issues. The Division wants to make sure there is a full discussion and understanding of these issues so that when it develops its proposal for the Basic Standards, stakeholders will understand the issues.
<b>Interested_affected_entities</b>	Any permitted dischargers and WQ Stakeholders might be interested.
<b>When_is_action_proposed_to_begin</b>	The Work Group is underway. Monthly meetings are scheduled through December 2015. The proposal for is due January 2016. An additional meeting is scheduled for February 2016.
<b>Estimate_monthly_or_annual_meetings</b>	8
<b>Monthly_or_Annual_Choice</b>	Monthly
<b>How_will_action_be_implemented</b>	The actions will inform all the parties’ proposals and pleadings in the rulemaking process.

**How\_will\_results\_be\_determined**

The results of the work group effort are open ended at this time. The work group effort will shift to the formal rulemaking process by December 2015.

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<b>Title_of_proposed_action</b>	Various actions concerning implementation of standards, policies, regulations in permits ( <a href="#">Permit Issues</a> Forum)
<b>Sponsor_entity</b>	Permittee-led workgroup with participation and input from WQCD and other interested stakeholders
<b>What_is_action_being_considered</b>	Various actions concerning implementation of standards, guidance, policies, and regulations in permits; to understand how applied and to evaluate whether any change was needed
<b>Why_is_action_considered_now</b>	Implementation of standards, guidance, policies, and regulations into permits is constantly evolving as experience is gained and new requirements are adopted. Permittees have a desire to understand and work with the Division to most effectively implement these requirements in permits.
<b>Interested_affected_entities</b>	Permittees, WQCD, and other stakeholders that are interested in permits
<b>When_is_action_proposed_to_begin</b>	The Permits Issues Forum is a currently existing workgroup.
<b>Estimate_monthly_or_annual_meetings</b>	10
<b>Monthly_or_Annual_Choice</b>	Monthly
<b>How_will_action_be_implemented</b>	It will depend on the issue in question. The workgroup develops a workplan for the issues that will be considered over the year. A white paper is prepared for each of the issues that considers these questions as well as who are the affected parties, Division staff that should be consulted, recommended outcomes, and Division efficiency and business process improvements and/or impacts.
<b>How_will_results_be_determined</b>	It will depend on the issue in question. The white paper prepared to identify the issue will include a recommended outcome. Results will be determined by meeting the objective identified on the white paper.

<b>Title of proposed Action</b>	<b>Basic Standards – Water Quality Standards based on Secondary Drinking Water Standards – Dissolved Iron, Manganese, Sulfate and Chloride</b>
<b>sponsor</b>	Centennial Water and Sanitation District and Plum Creek Water Reclamation Authority
<b>actionConsidered</b>	<p>The Water Quality Control Division has proposed removal of numeric water quality standards based on secondary drinking water standards for dissolved iron, manganese and sulfate with reliance on the narrative standard for use protection. Plum Creek and Centennial both support this proposal. Centennial proposes that the numeric water quality standard for chloride also be removed with reliance on the narrative standard for use protection. In the alternative, if the numeric standards for dissolved iron, manganese, sulfate and chloride are not removed, that the antidegradation provisions of Regulation 31.8 not apply to these secondary drinking water standards.</p>
<b>actionReason</b>	<p>Centennial, Plum Creek and other dischargers have encountered permit compliance problems with water quality based and antidegradation based effluent limitations for manganese and chloride. The standards for dissolved iron, manganese, chloride and sulfate are not based on protection of human health or aquatic life. They are rather based on aesthetic considerations and are not mandatory EPA water quality criteria.</p>
<b>potentialEntities</b>	<p>Dischargers with dissolved iron, manganese, sulfate and chloride in their discharge at levels above effluent limits derived from water quality standards. Water quality stakeholders, particularly municipal wastewater treatment systems, must comply with water quality based effluent limitations or antidegradation based effluent limitations even though these parameters may be present in the municipal raw water supply. Drinking water providers may be concerned about levels of these secondary drinking water parameters.</p>
<b>DatePicker</b>	9/15/2014
<b>actionImplemented</b>	<p>The proposal would be adopted by the Commission at the 2016 Basic Standards Rulemaking hearing and thereafter be incorporated in subsequent basin hearings. It would ultimately be implemented by changes to effluent limitations in discharge permits.</p>
<b>resultsDetermined</b>	<p>The results will be determined by anticipated changes to effluent limitations in discharge permits.</p>

<b>Title_of_proposed_action</b>	<b>Revision to Water Quality Control Commission Regulation 43, On-site Wastewater Treatment System Regulation</b>
<b>Sponsor_entity</b>	Water Quality Control Division
<b>What_is_action_being_considered</b>	<p>Division led stakeholder group to conduct a regular periodic review of Regulation 43 to consider revisions or updates to the regulation as necessary. The objective will be to maintain the current focus of Regulation 43 on wastewater treatment rather than disposal and to continue aligning the regulation with accepted industry standards. The stakeholders are different than those who typically participate at the Forum and include Local Public Health Agencies; Colorado Professionals in On-Site Wastewater; Colorado Directors of Environmental Health, and OWTS designers, installers, and product manufacturers. The Division expects to reach out to these stakeholders and create a webpage to disseminate workgroup information and meeting dates.</p>
<b>Why_is_action_considered_now</b>	<p>Upon implementation and the initial use of Regulation 43, a few items have surfaced that need to be clarified or corrected. A few sections have required the Division to issue guidance documents to ensure consistent application of the regulations. Other sections in the regulation have been interpreted to be in conflict with each other.</p>
<b>Interested_affected_entities</b>	<p>Local Public Health Agencies; Colorado Professionals in On-Site Wastewater; Colorado Directors of Environmental Health, and OWTS designers, installers, and product manufacturers. Most are expected to welcome the clarifications and corrections.</p>
<b>When_is_action_proposed_to_begin</b>	<p>Stakeholder process expected to be announced Summer 2015.</p>
<b>Estimate_monthly_or_annual_meetings</b>	1
<b>Monthly_or_Annual_Choice</b>	Monthly
<b>How_will_action_be_implemented</b>	<p>Adoption of the revisions to Regulation 43 by the Water Quality Control Commission. Following adoption by the Commission, local public health agencies will need to revise their local regulations similarly within a specified period to be defined in the regulation (e.g., one year after the Commission action).</p>
<b>How_will_results_be_determined</b>	<p>Number of clarifications and corrections, revisions, and conflicts resolved. Improved OWTS decisions and operations.</p>



<b>Title_of_proposed_action</b>	<b>Temperature Standards for Shoulder Seasons and Transitional Streams</b>
<b>Sponsor_entity</b>	Northern Water
<b>What_is_action_being_considered</b>	Multiple streams are or may be listed as impaired during shoulder seasons. Multiple transitional streams may also be listed during times of high or low flow when their aquatic communities vary from the stream classification. Aquatic life in these segments, however, may not really be impaired and only listed because the standards don't appropriately recognize variable naturally occurring conditions.
<b>Why_is_action_considered_now</b>	The Basic Standards hearing is coming up in 2016, which is the next appropriate time to address these issues on a state-wide basis.
<b>Interested_affected_entities</b>	WQCD, CPW, environmental groups, wastewater dischargers, water rights diverters. Most are likely to support the discussion (the WQCD has already raised shoulder seasons in the Basic Standards Work Group).
<b>When_is_action_proposed_to_begin</b>	Following the July 2015 Retreat
<b>Estimate_monthly_or_annual_meetings</b>	4
<b>Monthly_or_Annual_Choice</b>	Monthly
<b>How_will_action_be_implemented</b>	Changes to the Basic Standards, implementation in the basin hearings.
<b>How_will_results_be_determined</b>	Reduction in number of segments listed as impaired for temperature, fewer site-specific standards, fewer temporary modifications, and fewer proposed discharger specific variances.

<b>Title_of_proposed_action</b>	<b>Temperature workgroup</b>
<b>Sponsor_entity</b>	Vranesh and Raisch
<b>What_is_action_being_considered</b>	Formation of a temperature workgroup.
<b>Why_is_action_considered_now</b>	<p>Consolidate discussion of multiple temperature-related regulatory and policy issues in one workgroup. Most of the topics below are already under consideration by the basic standards or permit issues forum, but the WQF should consider whether discussion would be better organized under a single topic-specific workgroup, because several of the topics involve standards, permitting, and engineering issues.</p> <p>* Review of shoulder season standards. Early in the Basic Standards Workgroup process, the Division presented two alternative approaches to adjusting the “shoulder season” (more commonly known as fall and spring). The fall and spring standards may be modified 1) to address the sudden transition between the summer and winter temperature standards, in order to more closely represent a normal pattern of seasonal temperature changed; and 2) to address compliance issues related to the sudden transition between summer and winter temperature standards. Discussion of these alternative approaches has been stalled in the Basic Standards Workgroup, as the stakeholders were waiting for potential Commission action on proposals by the Littleton/Englewood Wastewater Plant and the City of Boulder before engaging in further workgroup discussion. Modified standards may resolve compliance problems associated with facilities that only exceed estimated effluent limitations in the early or late winter. Modified standards also may affect the extent of the compliance problem for facilities that exceed estimated effluent limitations during the entire winter season. Facilities that are planning to prepare variance proposals need to be able to identify the extent of those facilities’ compliance problems in order to prepare alternatives analyses. Therefore, the current status of shoulder season standards is a source of uncertainty that affects all facilities with winter temperature compliance problems.</p> <p>* Review of winter acute table value standards. In the Basic Standards Workgroup, Colorado Parks and Wildlife presented an approach to modifying the winter acute table value standards using literature values. The Basic Standards Workgroup formed a Technical Advisory Committee to work on this issue, and the Division has hired a consultant to update the Colorado temperature database in preparation for this work. Stakeholders anticipate that investigation of alternative standards will recommence after the Regulation 38 rulemaking hearing.</p> <p>* Feasibility study. The Colorado Water Resources and Power Development Authority has provided funding for a feasibility study focused on technologies for reducing temperature in domestic wastewater effluent. The work</p>

may be patterned after guidance developed by the State of Washington, adapted for conditions in Colorado. The Division is currently developing an RFP to retain a consultant for this work. It is unclear when an RFP will be published and how long the contracting process will take, and therefore at this time it is unclear when the work will begin. Also, at this time it is unclear whether the feasibility study would result in a guidance document or whether it may be adapted to develop a sector-based variance for domestic wastewater facilities or a subset of those facilities. The Basic Standards Workgroup has formed a sub-group to discuss the feasibility study, although that work has been suspended until after the Regulation 38 hearing.

\* Permit implementation. In 2013, the State of Wisconsin updated its Guidance for Implementation of Wisconsin's Thermal Water Quality Standards. The guidance document includes methods for evaluating alternative effluent limitations for temperature, water quality models, mixing zones, and other flexible approaches to temperature implementation. In 2007, when the Commission adopted temperature standards, it directed the Division to re-examine its Reasonable Potential Guidance in order to provide more flexible methods for implementing the revised temperature standards. Reg. 31.45, pg. 186. Stakeholders anticipate discussion with the Division about appropriate permitting approaches based on Wisconsin's Guidance and other alternative approaches. Until the Division and stakeholders understand the range of options available for deriving water quality-based effluent limitations, there remains uncertainty about the feasibility of meeting WQBELs. In particular, before a party proposes a discharger-specific variance, the Commission's Policy 13-1 indicates that the party should first understand whether the WQBELs have been correctly determined. WQCC Policy 13-1, p. 5. Therefore, understanding alternative methods of calculating effluent limitations is a key step toward developing DSVs.

\* Consider temperature-specific issues that may arise in the development discharger-specific variance, with possible development of guidance.

<b>Interested_affected_entities</b>	All stakeholders, particularly: 1) domestic wastewater treatment plant operators
<b>When_is_action_proposed_to_begin</b>	August 2015. Meetings may alternate with the basic standards workgroup until the basic standards hearing in 2016.
<b>Estimate_monthly_or_annual_meetings</b>	12
<b>Monthly_or_Annual_Choice</b>	Monthly
<b>How_will_action_be_implemented</b>	<ol style="list-style-type: none"> <li>1. Regulation 31 temperature provisions.</li> <li>2. Reasonable potential guidance</li> <li>3. DSV Policy</li> <li>4. Temperature feasibility guidance.</li> </ol>

- 5. Temperature implementation Policy.
- 6. Temperature implementation in permits policy.

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**How\_will\_results\_be\_determined**

Basic Standards 2016 rulemaking.  
Policy and Guidance development.

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<b>Title_of_proposed_action</b>	<b>Regulation 84 and On-Site Wastewater Treatment and Reuse</b>
<b>Sponsor_entity</b>	Denver Water
<b>What_is_action_being_considered</b>	To develop regulatory pathways that allow for the on-site treatment and reuse of wastewater, including blackwater and graywater, generated from commercial, institutional and multi-family buildings using green infrastructure and sustainable resource recovery systems. The action may potentially involve expansion of authorized uses under Regulation 84 to include new uses such as indoor toilet flushing, decorative fountains, and edible crops.
<b>Why_is_action_considered_now</b>	With the advent of green initiatives, including EPA's emphasis on green infrastructure, and growing desire to achieve sustainable development, demand is increasing for new development that incorporates ecologically friendly systems capable of treating wastewater to reduce potable water demands and improve the quality of wastewater discharged to our watersheds. Colorado's Water Plan, which is nearing completion emphasizes the need for conservation, reuse, and maximum use of local supplies. Water quality regulations have not kept pace with these changes in demand and policy. Adjustments to certain water quality regulations, such as expansion of authorized uses for reclaimed water, for example, may be necessary to allow such treatment of wastewater, while continuing to protect public health and the environment.
<b>Interested_affected_entities</b>	Supporters and opponents of the action are not known at this time, but supporters will likely consist of the Green Building Industry, and Cities and Counties interested in green building initiatives. The Water Quality Control Division will be a key stakeholder in the process. The agricultural community may also be interested in the expansion of Regulation 84 to include agricultural uses.
<b>When_is_action_proposed_to_begin</b>	July, 2015
<b>Estimate_monthly_or_annual_meetings</b>	1
<b>Monthly_or_Annual_Choice</b>	Monthly
<b>How_will_action_be_implemented</b>	This action may be implemented through modifications to existing regulations including, for example, regulations 84, 86, and 43, or adoption of a new control regulation, or a combination of both.
<b>How_will_results_be_determined</b>	The results may be determined by: (1) whether necessary modifications are made to allow for on-site reuse of wastewater through green building initiatives; and (2) whether applications are submitted to take advantage of new authorized uses such as, for example, letters of intent under Regulation 84.

<b>Title_of_proposed_action</b>	<b>Regulation #85 Nutrients Management Control Work Group</b>
<b>Sponsor_entity</b>	Water Quality Control Division
<b>What_is_action_being_considered</b>	The Triennial Review Informational Hearing for Regulation #85 will be held in October 2015. If the Water Quality Control Commission determines that a rulemaking will be required for Regulation #85 then a work group may be needed to discuss the recommended changes to the regulation. The objective of the work group would be to discuss and develop collaboratively any recommended changes to the regulation prior to the rulemaking hearing.
<b>Why_is_action_considered_now</b>	If a rulemaking will be held to consider changes to Regulation #85 the Division wants to make sure there is a full discussion and understanding of the issues so that when it develops its proposal for Regulation #85, stakeholders will understand the issues.
<b>Interested_affected_entities</b>	Any permitted dischargers and water quality stakeholders might be interested.
<b>When_is_action_proposed_to_begin</b>	June 2016. With meetings be held quarterly until the rulemaking hearing.
<b>Estimate_monthly_or_annual_meetings</b>	4
<b>Monthly_or_Annual_Choice</b>	Annual
<b>How_will_action_be_implemented</b>	The actions will inform all the parties' proposals and pleadings in the rulemaking process.
<b>How_will_results_be_determined</b>	The results of the work group effort are open ended at this time.

**Title\_of\_proposed\_action**

**Review of Antidegradation Evaluation Process**

**Sponsor\_entity**

GEI Consultants

**What\_is\_action\_being\_considered**

Regulation 31 (Section 31.8(2)(b)) requires an antidegradation analysis be conducted for review of all regulated activities influencing reviewable waters. Discharge permits are covered under this provision, and the associated antidegradation reviews often result in limits based on either explicit (permit limits/loads as of September 2000) or implicit (maximum effluent concentration observed between October 1998 – September 2000) non-impact limits (NILs). NILs are selected when a “degradation” is expected to occur if water quality based effluent limits (WQBELs) are allowed. While there may be scenarios where such a presumed degradation would be legitimate, this is not actually the case when WQBELs are based on standards that have been recently updated to reflect the evolving state-of-the-science. An increasingly common example is when Biotic Ligand Model (BLM)-based, site-specific copper standards are adopted and the corresponding WQBELs are greater than NILs. This situation is also likely to occur in hard waters with the new hardness-based aluminum standards (although we are not aware of any specific permit issues at this time). However, since BLM-based (or even new/updated hardness-based) WQBELs incorporate the same level of aquatic life protection (i.e., as required by the Clean Water Act for acceptable water quality criteria) as that used to derive historical limits, we do not believe a true “degradation” would occur if the WQBELs were selected. In other words, even though our understanding of the mechanisms underlying copper toxicity has changed, the actual stringency associated with BLM-based criteria is no different than that associated with hardness-based criteria, despite the fact that the magnitude of the criteria may differ across these two methods. If the aquatic life protection stringency is the same, there is no potential for aquatic life degradation. Given recent issues with new site-specific standards resulting in no change in discharge limits, and thus, no benefit to stakeholders, we feel this issue is ripe for reconsideration.

**Why\_is\_action\_considered\_now**

There are at least a few BLM-based, site-specific water quality standards for copper that have already been adopted, and it is likely that more may be coming. Facilities that discharge into segments with such site-specific standards have begun requesting permit modifications and this issue has come to the forefront.

**Interested\_affected\_entities**

The potentially interested/affected entities are:

- The Water Quality Control Division – this issue affects both Regulations 31 and 61
- The Environmental Protection Agency – antidegradation is an important element of the Clean Water Act
- Colorado Parks and Wildlife – mission to ‘perpetuate the

wildlife resources of the state'

- The regulated community, especially those with or considering BLM-based, site-specific standards – their permit limits are affected, or those considering any other updated aquatic life standard that could lead to higher WQBELs—and yet achieve the same levels of aquatic life protection according to USEPA guidance.

We expect the action may be met with some initial resistance by the regulatory agencies but hope we can have productive discussions wherein we think carefully about the intention behind the antidegradation requirement and how this can be maintained in light of scientific progress. We expect the regulated community will support the action so that they can realize the full benefit of updated or site-specific standards that have been/will be adopted.

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<b>When_is_action_proposed_to_begin</b>	We propose a work group discuss this issue in late 2015 – early 2016, and if there is sufficient agency and stakeholder support, leading up to the Basic Standards Rulemaking in June 2016.
<b>Estimate_monthly_or_annual_meetings</b>	4
<b>Monthly_or_Annual_Choice</b>	Monthly
<b>How_will_action_be_implemented</b>	Depending on the outcome of the work group process, this may be an issue to present to the Water Quality Control Commission at the Basic Standards Rulemaking, since the antidegradation analysis requirement for permits is set forth in Regulation 31.
<b>How_will_results_be_determined</b>	The work group process will determine the path forward and the desired results in terms of potential for proposed changes to policy in the form of revised text in Regulation 31 and possibly proposals for change in Regulation 61 for consistency.

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**Title\_of\_proposed\_action**

**Colorado Water Quality Management Short-Term Strategic Plan**

**Sponsor\_entity**

Various Stakeholders: Dave Akers, Tim Grotheer (Centennial Water and Sanitation District), Christine Johnston (Xcel Energy) and Sarah Reeves (Brown and Caldwell)

**What\_is\_action\_being\_considered**

To develop a three to five year data driven and results focused water quality management strategic plan. The objectives of the plan would be to provide logistical support and guidance to the Water Quality Control Division (Division) and the regulated community to ensure that implementation of standards will result in restoration and/or protection of the receiving water taking into account costs and tangential effects such as energy consumption. This would be supported by data and analysis that would help identify implementation approaches most likely to achieve goals as well as to prioritize any new standards initiatives.

**Why\_is\_action\_considered\_now**

In recent years the Water Quality Control Commission has adopted several water quality standards regulations that have large logistical and financial implications for a wide variety of municipal and industrial dischargers and significant implementation "costs" for the Division. These include standards for temperature and nutrients. In addition, there are older standards (e.g., chloride, sulfate, and arsenic) and likely future standards (e.g., new ammonia criteria) whose implementation may result in similar impacts. Finally, there are also many streams with 303(d) listings for other parameters which, as TMDLs are developed, will require additional resources from the Division and the regulated community.

There is currently no broad plan to define an approach for the Division and the affected permittees to successfully prioritize and implement these different standards/TMDLs. As such, at times, the Division and the regulated community are stretched thin trying to understand and address major water quality issues without the desired amount of scientific information or robust predictive tools. The Water Quality Forum Path Forward Committee had discussed this issue in 2012-13 but didn't develop any proposal in this regard for further consideration.

Colorado needs a big picture approach that helps the water quality management community set and achieve goals for the state's water quality into the future. The State Water Plan sets a goal that all waters in Colorado will meet adopted water quality standards by the year 2050. In order to begin to set the stage for achieving this goal there needs to be a strategy to identify the most important water quality issues affecting uses in Colorado at this time and to direct our cumulative resources to addressing those issues. This will require a new strategy different from the current less-coordinated approach.

The Forum, as the leading organization of stakeholders on water quality matters, is the logical group to lead this effort. This will require the Division and regulated entities to work together to develop priorities that can be implemented within a realistic time.

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**Interested\_affected\_entities**

Interested/affected entities are the stakeholders that have an interest in water quality in Colorado. This includes industries, municipalities, environmental groups, the Division, and other state and federal agencies. Our expectation is that all of these entities will support the action, as they are all resource limited and have a stake in the water resources of our state.

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**When\_is\_action\_proposed\_to\_begin**

A scoping meeting should be held no later than August, but as soon as possible after the Forum retreat.

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**Estimate\_monthly\_or\_annual\_meetings** 6

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**Monthly\_or\_Annual\_Choice**

Monthly

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**How\_will\_action\_be\_implemented**

The Strategic Plan should be presented to the Commission each year on a schedule that would allow for broad public feedback and recommendations from the Commission, as the Commission is the ultimate authority on the priorities of the state with regard to regulation of water quality. The Plan would then inform Colorado's discussions with EPA and other stakeholders and would be the basis for the Division's annual work plan. It would also help define the priorities for developing new regulations and implementation approaches for existing regulations.

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**How\_will\_results\_be\_determined**

The workgroup would be successful upon completion of a Strategic Plan that directs resources to achieve the best results to protect the uses of water in Colorado. This would be done through the Water Quality Forum and presented for review, comment, and acceptance by the Commission.

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