

# Watershed Planning for Water Quality Improvement: *TMDL Implementation Plans*

Section 303(d) of the federal Clean Water Act requires states to develop water quality improvement plans, called "total maximum daily loads" ([TMDLs](#)), for water bodies that are not meeting their beneficial uses. The goal of a TMDL is to set limits on pollutant levels to correct water quality impairments and achieve beneficial uses of water bodies through attainment of water quality standards. The U.S. Environmental Protection Agency (EPA) must approve each TMDL. Once the EPA has approved a TMDL, an implementation plan is written, typically within 18 months.

## What is an Implementation Plan?

An implementation plan is a document, guided by an EPA-approved TMDL, that describes actions needed to achieve load reductions, outlines a schedule of those actions, and specifies monitoring needed to document progress toward meeting water quality standards.

An implementation plan provides a framework for local stakeholders to use to reach the goals established in the TMDL.

An implementation plan generally includes the following:

- A list of actions needed to reduce pollutant concentrations
- A timeline for implementing the plan
- Reasonable assurances that implementation will occur
- A list of who will be responsible for undertaking planned actions
- An explanation of how progress on actions will be tracked
- A monitoring or modeling plan with milestones for measuring progress
- A description of how data will be evaluated and used to recommend revisions to the TMDL
- A schedule of dates by which water quality standards are expected to be met, including interim goals or milestones as deemed appropriate

## Who Writes the Implementation Plan?

Plans are developed by a variety of stakeholders including government agencies, local citizens, and the watershed advisory group ([WAG](#)) for the area. [Designated government agencies](#) and the WAG are generally the driving force behind the plan and are responsible for identifying appropriate implementation measures. DEQ serves as the repository for implementation plans and often coordinates, or assists in, developing the plan, writing the document, and prioritizing projects for implementation. However, it is often other agencies (such as the Idaho Department of Lands or the Soil Conservation Commission) that actually write the plan.

The general public, through the WAG and other processes, is provided with opportunities to be involved in developing the implementation plan to the maximum extent practical.

## Who Implements the Plan?

[Idaho Code](#) states that "designated agencies" are responsible for implementing the plan. Designated agencies are defined as:

- Idaho Department of Lands (timber harvest, oil and gas exploration and development, and mining issues)
- Soil Conservation Commission (grazing and agriculture issues)
- Idaho Department of Transportation (public road issues)
- Idaho Department of Agriculture (aquaculture issues)
- DEQ (all other issues)

The U.S. Forest Service and the Bureau of Land Management, through governmental memoranda of understanding, also serve as designated agencies on the federal lands they manage. Ultimately, however, it is all the on the ground land managers, landowners, and citizens who are responsible for implementation, and who reap the rewards of achieving the plan's goals.

## What Happens After the Plan is Written?

Once an implementation plan is written and has been reviewed by the WAG, the designated agencies and others begin to implement the actions outlined in the plan. However, pollution control measures are often well underway before the plan is completed. Controlling pollutants is a long, on-going process, not something that occurs at just one point in time or just because an implementation plan has been written.

DEQ, the WAGs, and the designated agencies regularly monitor progress toward meeting TMDL goals and revise the plan accordingly. Implementation plans are designed to be living documents that regularly change based upon new knowledge or technologies and the results of continued monitoring that show progress, or the lack thereof, toward meeting goals.

## What is a BMP?

The term, "best management practice," or "BMP," is often used to describe the actions or methods taken to help achieve TMDL goals. A BMP is a conservation practice that has been found to be an effective means of preventing or reducing pollution from [nonpoint pollutant sources](#). An example of a BMP for a grazed area with sediment or bacteria issues would be to construct a fence and use watering troughs to keep cattle away from the stream.

## Who Pays for the Implementation Actions and BMPs?

The source of funding for BMPs is somewhat dependent on the landowner. Projects on federal lands are typically funded through the agency that manages those lands. Projects conducted on private or state lands may be funded through a variety of funding mechanisms, including "\$319 grants" administered by DEQ. These are grants established under Section 319 of the Clean Water Act to support nonpoint source pollution management activities. [Click here to learn more about \\$319 grants](#).