

Coming Together for Clean Water

U.S. Environmental Protection Agency

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Online Discussion Forum Comment Index

This appendix lists comments received on three areas presented to the public through the online discussion forum for Coming Together for Clean Water. Comments are shown alphabetically by topic, with the frequency of that topic listed after it. Topics which were discussed in a variety of contexts are further organized into sub-topics, much like a book index.

Topic 1: The Watershed Approach

Air deposition of water pollutants, account for—1

Citizen monitoring programs, establish—3

Clean Water Act (CWA)

Revise—1

Restoration of following Supreme Court decisions *SWANCC* and *Rapanos*—5

Expand—2

--to include protection of habitat

--beyond “navigable waters”

Section 303d revision—2

--States without budget for remediation are reluctant to list impaired waters

--Disincentive to delist because funding based on listed streams

Rectify disconnect with Safe Drinking Water Act—1

Coordinate all sections of—1

Poorly suited to watershed approach—1

Climate change, account for—1

Conservation drainage, increase use of—1

Coordination

Of jurisdictions/organizations across watersheds—6

Of funding sources/distribution—3

Of regulations/policies/permits—5

Of data—3

Between freshwater and salt water regulation—1

Within EPA/federal programs—1

Dam removal—4

Designated use, do not allow states to weaken—1

Downstream uses of waterways, account for—1

Emerging contaminants, address—8

Enforcement (increased)

General—3

Of illegal discharges—1

Take citizen reports of violations seriously—1
Greater accountability for developers—1
Rather than voluntary programs—1

Environmental justice, consider when issuing permits—2

Funding (increased)

For upstream/coastal projects—2
Predictability/reliability of—1
To implement TMDLs—1
Allow 319 grants to fund staff positions—1
Federal matching/cost-sharing—2
For local watershed groups—1
For site-specific research—1
For increased technology—1

Hydraulic fracturing, regulate/ban—3

Impermeable membranes, use in deep waste pit storage—1

Incentives rather than enforcement—2

Land-use planning, watershed-wide—1

Lawn chemicals, ban/regulate manufacture/sale of—8

Mountaintop mining/stream burying, ban—9

Nonpoint-source pollution (NPS)

Increase regulation of—1
Do not regulate without authority—1

Outreach/education (increased)

About invasive species—1
Lead by universities/nonprofits—1
Of watershed residents—17
Of school children—4
Of industries—2
Regarding effects of landscaping/development on watersheds—2
Regarding shoreline degradation—1

Pollution trading, cannot undermine current requirements—1

Population growth, curb—2

Regulation (increased)

Of landscaping industry—1
Of dumping—1
Of mercury—1

Riparian buffers/corridors, require farmers/landowners to install—19

Scale up/down

Local efforts up to state- or nation-wide—1

National messages down to local situations—1

Sewage sludge

Stop application of—17

Convert to energy—1

States

Allow flexibility for in establishing priorities—2

Marine reserves, establish—1

Total Maximum Daily Loads (TMDL)

Adapt USDA's Conservation Measurement Tool—1

Adaptive management techniques, use instead—1

Better implementation—3

Deadlines, incorporate into—1

Keep non-listed watersheds healthy—1

Scorecards, use to track pollutants involved in impairment—1

Use watershed groups to implement—1

Target worst-case impairments first—3

Expand to dam regulation and flow impairment—1

Establish federal variations for interstate waters—1

Urban communities, increase involvement of—1

Vegetation

Native, encourage use of—3

Increase amount of—1

Voluntary programs, increase use of over more enforcement—3

Water efficiency, encourage to reduce strain on watersheds—1

Water quality monitoring

Increase frequency—2

Watershed-wide sensor systems, use of—1

Allow site-selection-only data—1

Watershed approach

Clearly define—1

Don't use an excuse to delay setting specific pollution limits—1

Wetlands

Construction of, encourage—1

Clarify guidance for protection of—1

Maintain function of—2

Topic 2: Nutrient pollution

Agriculture

Treat as point-source pollution—4

Stop exemptions for—1

Regulate nutrients from—1

View as a partner, not an adversary—5

Best/Adaptive Management Practices (BMPs)

Encourage use of —3

Use of instead of numeric criteria—2

Establish “pollutant-load reduction matrix” for each—1

Clean Water Act (CWA)

Coordinate with SDWA—1

Cover “nutrient sinks” (headwaters/wetlands) in—1

Define “propose to discharge” in relation to CAFOs—1

View as a whole for “big picture” of clean water—1

Revise to include emerging contaminants—1

Community ombudsman, establish to help citizens navigate laws—1

Concentrated Animal Feeding Operations (CAFOs)

Emissions deposited in water, account for—1

Require to treat wastewater—2

Require all to get discharge permits—2

Require co-permitting of with vertically integrated farms—1

Consumer products, ban phosphates in—1

Data

Clear guidance needed on approvable site-specific nutrient criteria—1

Provide more on ecosystem services—1

Use water chemistry w. watershed lithology to predict background concentrations—1

Discharges

Limits based on newest available technology—1

Promulgate national, technology-based limits—1

Enforcement (increase)

General—4

Harsher fines—1

Investigate citizen complaints seriously—1

On sub-CAFO-sized farms—2

Provide alternative to for when mitigating nutrient pollution is not possible—1

Facilities, allow to follow cost/benefit analysis of any required upgrade—1

Fertilizer

Promote/require phosphate-free versions—1

Create from byproducts of ethanol—1

Flooding

Prevention, encourage—1

Geotextiles, use to prevent—1

Groundwater monitoring, require CAFOs to install—1

Groundwater nutrient contamination, account for—1

Hypoxia Task Force, strengthen—1

Impaired waters

- Ban new discharges to—1
- Restrict access to—2

Incentives, use of over enforcement—1

Infrastructure upgrades, integrate to consider issues beyond nutrient pollution—2

Livestock

- Tax to fund waste treatment—1
- Limit according to amount of waste nearby waters can handle—1

Low Impact Development, use of to reduce nutrient pollution—1

Manure

- Regulate distribution of—3
- Ban raw application of as fertilizer—2
- Ban stockpiling of—1
- Ban use of as fertilizer in areas without karst substrates—1
- Use to create energy—2

Metals pollution/accumulation, address—2

Monitoring, more consistent/easier—6

Natural soil cycle, restore—1

No-till farming, encourage use of—5

Numeric criteria

- Establish/enforce—7
- Account for regional differences in soil type, rainfall, crops, etc.—2

Outreach/education (increase)

- Of farmers—6
- On dangers of fertilizer (general audience)—3
- Of government transportation departments—1

Regulation of farms

- Harmful to economy—1
- More tools to address ag-related NPS—1
- Decrease/do not increase—2
- Regs must be based on science—1

Removal/treatment methods

- Biological treatment, develop—1
- Broad-based, multi-state coordination—1
- Develop for septic systems—2
- Methanol denitrification—1
- Nanofiltration—1
- Packed tower aeration—1
- Plant cattail marshes to soak up nutrients—1
- Use of wastewater effluent as nutrient delivery system—1
- Treat for 100% of nitrogenous/urine pollution in water—1

Safe Drinking Water Act, use to study emerging contaminants—1

Soil organic matter, increase through carbon sequestration—1

States

Allow to administer their own nutrient programs—3

Encourage them to develop functional indicators of stream conditions—1

Enforce antidegradation policies in—1

Subsidies, end—2

Total Maximum Daily Loads (TMDLs)

Develop for nutrient loadings—1

Include point-source reductions in—1

Voluntary programs

Use of over enforcement—2

Cost-sharing for nutrient management—1

Water quality

Test before and after waste disposal—1

Use USGS National Water Quality Assessment info—1

Topic 3: Managing Stormwater

Alternative energy, promote to reduce water pollution—1

Army Corps of Engineers, take away environmental management capacity of—1

Asian carp, manage population of—1

Best Management Practices (BMPs)

Expand beyond green infrastructure—1

Provide data on life cycle cost of—1

Businesses

Require to offset runoff (e.g., through green infrastructure or onsite collection)—3

Climate change, account for—2

Coaltar, ban—1

Codes (building/zoning)

To stop urban sprawl—2

Alter to allow gray water—2

Include requirements for use of green infrastructure—2

Extend federal building requirements (in Energy Independence and Security Act) to all new developments—1

Work with developers/architects/landscapers to develop “green” codes—1

Consumer products

Ban “weed and feed” products—2

Limit pesticide use—1

- Require warnings about water pollution on household chemicals—1
- Cost-sharing
 - For manure digesters—1
 - For treatment of stormwater—1
 - To finance residential BMPs—1
- Diverse sources of runoff (silviculture, agriculture), address—2
- Dumping
 - Lock manholes to prevent—1
 - Promote soy-based vehicle fluids—1
- Enforcement
 - More consistent—2
 - Of individual-based laws (lawn care, littering, etc)—3
 - Of oil and gas industry (increased)—1
 - General (increased)—4
 - Stronger at city level—3
- Erosion/shoreline degradation
 - Force all structures (incl. historic) to conform to shoreline codes—1
 - More consistent laws (state to state)—1
 - Partner with erosion control industry—2
 - Plant trees—1
- Filtration systems, repair/improve—1
- Floodplains, protect from development—1
- Funding
 - Allow research and development with 319 funds—1
 - Increased—2
 - Prioritize grants for groups w. comprehensive watershed management plans—1
 - To train engineers in LID techniques—1
- Groundwater
 - Consider effects of stormwater filtration on—4
 - Develop BMPs for managing stormwater that are also protective of groundwater—1
- High density development/infill/vertical growth (encourage)—4
- Infrastructure
 - Do not divert CSOs into streams—1
 - Eliminate combined sewer systems—2
 - Make storm sewers more stream-like—1
 - Replace CSS with hydraulic sensitive treatment facilities—1
 - Replace with stream-friendly practices—1
 - Repair—4
 - Control inflow—1
- Impervious surfaces, decrease—3
- Litter, factor into post-construction TMDL—1

Low-impact Development (LID)

- Creating tax-incentives for—2
- Provide incentives for companies to adopt—1
- Provide process for cities to license developers who use it—1
- Require/encourage use of—10

National Pollutant Discharge Elimination System (NPDES)

- Consider high cost of implementation with relatively few environmental benefits—1
- Improve implementation by developers—1

Natural areas, retain when possible—2

Outreach/education

- Of public—10
- Of school children—2
- Of builders/developers/industry—4
- Of zoning boards—1
- On cost-savings of environmental design—3

Pharmaceuticals, ban flushing of—1

Pressure regulators, require placement on water meters to avoid blown fixtures—1

Regulations

- Extend urban runoff laws to roads that go outside city limits—1
- Make more cohesive—2

Retention areas, construct next to developed sites—2

Septic systems

- Convert to distributed sewer systems—1
- Regulate—1

Smart growth, use of to prevent runoff—2

Soil surveys, implement—1

Stormwater protection/management plans

- Develop with stakeholders to ensure buy-in—1
- Incorporate natural hydrology—1
- Incorporate land-use planning—3
- Review after implementation—1

Underground Injection Control

- Coordinate with other federal water regulations—1
- Redefine Class V wells to reference water source and exclude cases where stormwater infiltration is obvious intent—1

View stormwater as an asset—3