



303(d) Listing and Climate Change

EPA | Watershed Branch



Considerations for Climate Change

2024 Integrated Reporting Memo

- **Attainment of WQS**
 - Climate change related variables can impact attainment of WQS, including an array of water quality criteria and uses.
- **Coordination with Monitoring Programs**
 - 303(d) Programs can coordinate with their monitoring programs to evaluate and promote monitoring approaches that help develop data and information that account for climate change impacts to water quality.
- **Evaluating/Weighting Data and Information**
 - In evaluating/weighting available data and information, consider potential impacts of climate change, including increased water temperatures, changing precipitation patterns, increased storm intensity and frequency, increased droughts, sea level rise, etc.

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- **Assembling Data and Information**

- Climate change factors can inform appropriate approaches for assembling all available data and information.
- For example, if there is reason to expect impacts from variations in rainfall, runoff, water temperature, or other climatic effects on pollutant loading conditions, consider whether there are available data and information that result from monitoring strategies, water quality planning activities, or other approaches that account for these impacts and more effectively represent current pollutant loading conditions.
- In addition, to seek to account for climate change impacts on impairment, it is important to include cross jurisdictional sources, appropriate water quantity data, HABs surveys, advisories and sampling, and other data and information particularly relevant to climate change impacts on impairment.

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- **Vulnerable communities and populations**
 - Actively solicit data and information from communities and take steps to help communities provide data and information that are informed and usable for listing purposes.
 - Along with monitoring data, information to be assembled may include water quality related testimonials/stories and local knowledge from communities.
 - Attention should be paid to developing, analyzing, and using data and information that improves understanding of compounding stressors and their impacts on communities' public health and resources.

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- **Identifying Priorities for TMDL Development.**
 - As states, territories, and authorized Tribes identify priorities for TMDL development, they can consider whether there are impairments that may be particularly sensitive to changing climate conditions.
- **Appropriate Use of Subcategory 4c**
 - Where a water is not meeting applicable WQS due to non-pollutant pollution – for example anthropogenic hydrologic and habitat alteration – the water/non-pollutant impairment may be placed in IR Subcategory 4c.
 - Climate change is also impacting pollutant loadings, e.g., temperature and sediment, in numerous ways. A water/impairment may appropriately be in both Subcategory 4c and Category 5. Impaired segments must also be in Category 5 unless it can be demonstrated that no pollutant(s) causes or contribute[s] to the impairment.