

Administration of State Instream Flow Policy	Pro	Con
Water quality standards under CWA	<ul style="list-style-type: none"> <li>- permit limits can support instream flow criteria</li> <li>- permitting process and agency structure already in place in all states</li> <li>- numeric or narrative flow standards can be added relatively easily to existing water quality standards</li> <li>- usually no legislative action is necessary to establish flow standard</li> <li>- can support designated uses and anti-degradation CWA programs</li> <li>- mitigation can be required to avoid, minimize, and compensate for harmful impacts of water use to waters of the nation</li> </ul>	<ul style="list-style-type: none"> <li>- usually applies only when federal permits are required (e.g., CWA 401/404 permit)</li> <li>- does not usually apply to water users that are exempt from certain federal permits (e.g., agriculture, golf courses)</li> <li>- does not usually require water use reporting</li> <li>- limited enforcement of permit withdrawal requirements</li> <li>- does not allow for adaptive management of permitted use</li> </ul>
Water allocation under water supply management program	<ul style="list-style-type: none"> <li>- permit limits can support instream flow criteria and prevent undesirable cumulative impacts</li> <li>- allows for reporting of water use</li> <li>- allows for enforcement of permit limits</li> <li>- allows for adaptive management of permitted use</li> <li>- allows for adaptive management of permit requirements</li> <li>- mitigation can be required to avoid, minimize, and compensate for harmful impacts of water use to waters of the nation</li> </ul>	<ul style="list-style-type: none"> <li>- requires permitting program specifically for water allocation</li> <li>- may require legislative action to mandate instream flow protection</li> </ul>

**Table 4. Comparison of state instream flow programs administered under water quality standards versus state water allocation programs.**