

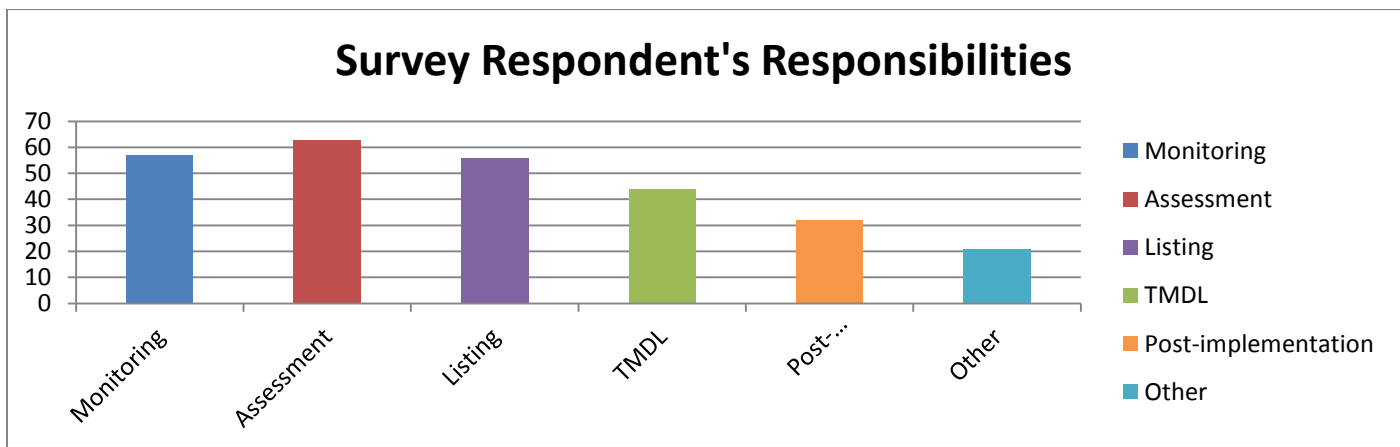
Overview of Responses Submitted to Clean Water Act 303(d) Vision Assessment Questionnaire (December 2014 – March 2015)

In December 2013, U.S. EPA released a new framework for managing Clean Water Act 303(d) program responsibilities, entitled “*A Long-Term Vision for Assessment, Restoration, and Protection under the Clean Water Act Section 303(d) Program,*” which was largely informed by a lengthy EPA-state collaborate process launched in 2011. ACWA hosted a series of calls from December 2013 – February 2014 devoted to state discussion of the Vision’s Prioritization, Engagement, and Alternatives Goals. In Fall 2014 we turned our attention to the Assessment Goal within the Vision. Following a series of calls, which included membership from both the Watersheds Committee and Monitoring, Assessment and Standards Committee, ACWA distributed a related online questionnaire to state participants. The below highlights comprise key results of the questionnaire on Assessment.

A total of 48 states¹ responded. Most states submitted one response but about 36% of states (18) submitted between 2-4 responses. The following are preliminary key findings:

State Program Participation and Structure:

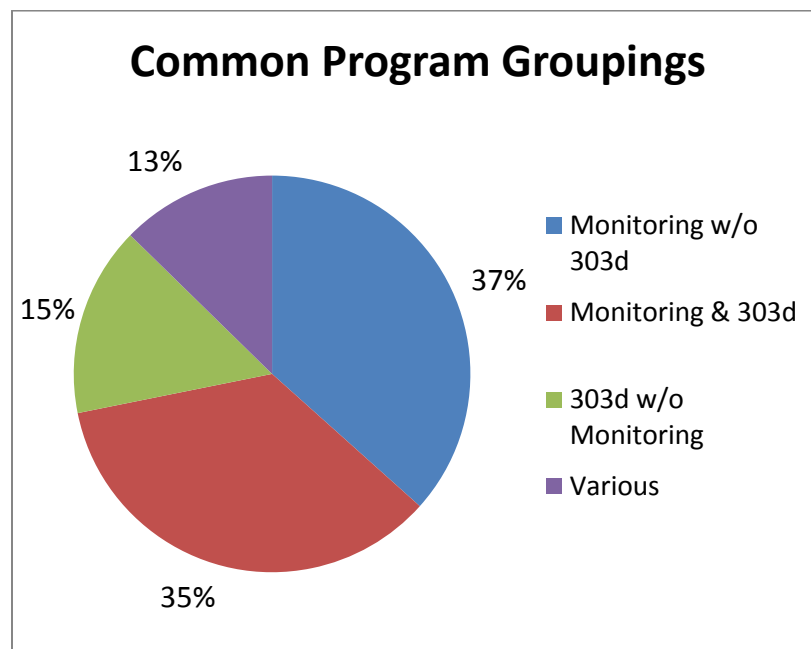
- Responses by program:
 - About 75% from M&A
 - About 50% from 303d



- The responses showed that people had responsibilities spanning multiple programs
 - 23% of responses indicated responsibilities that included Monitoring, Assessment, Listing, 303d, Post-implementation and Other

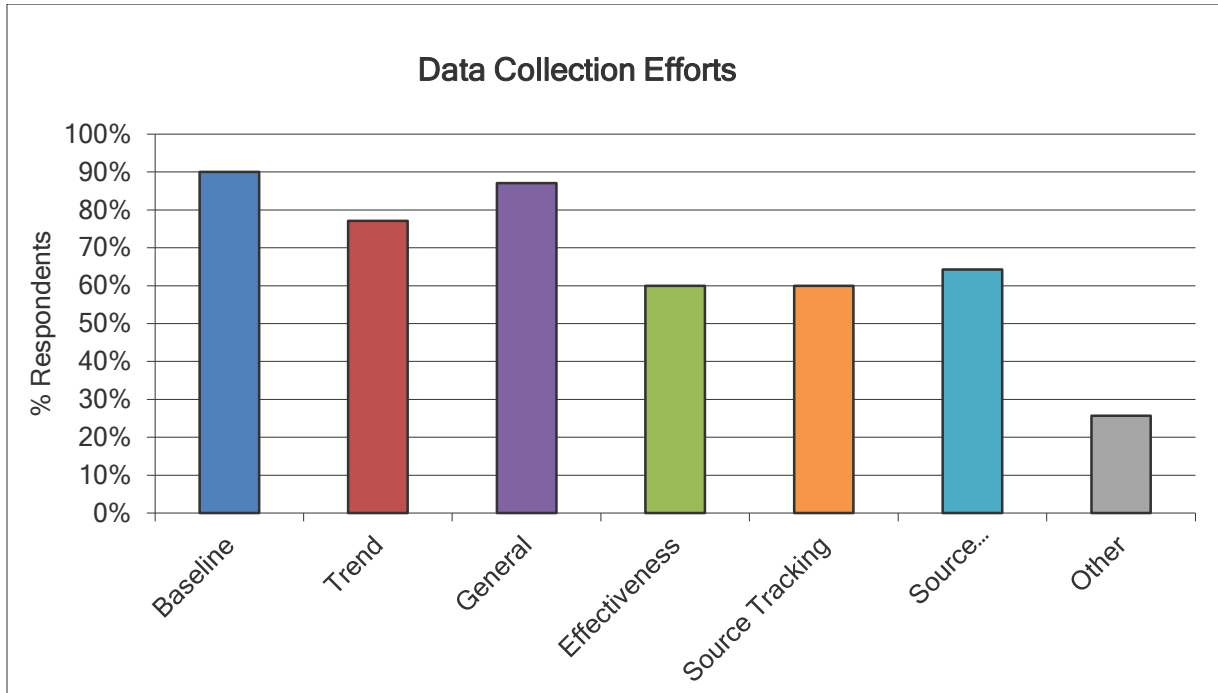
¹ States that have submitted responses as of March 26, 2015: AL, AK, AZ, AR, CA, CO, CT, DE, FL, GA, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, SD, TN, TX, UT, VT, VA, WV, WI, WY.

- The most common additional responsibility was the Water Quality Standards program. Other program responsibilities included the nonpoint source management program, water quality certification program, drinking water and land management programs.
- 62% of the respondents had responsibilities which included Monitoring and Assessment with just over half also having 303d responsibilities
- Of those with 303d responsibilities, they were often also paired with monitoring & assessment or listing. Only 11% of those with 303d responsibilities were not also associated with monitoring, assessment or listing.
- There were 21 different combination within state programs when considering how monitoring, assessment, listing, 303d, and post implementation activities are staffed.

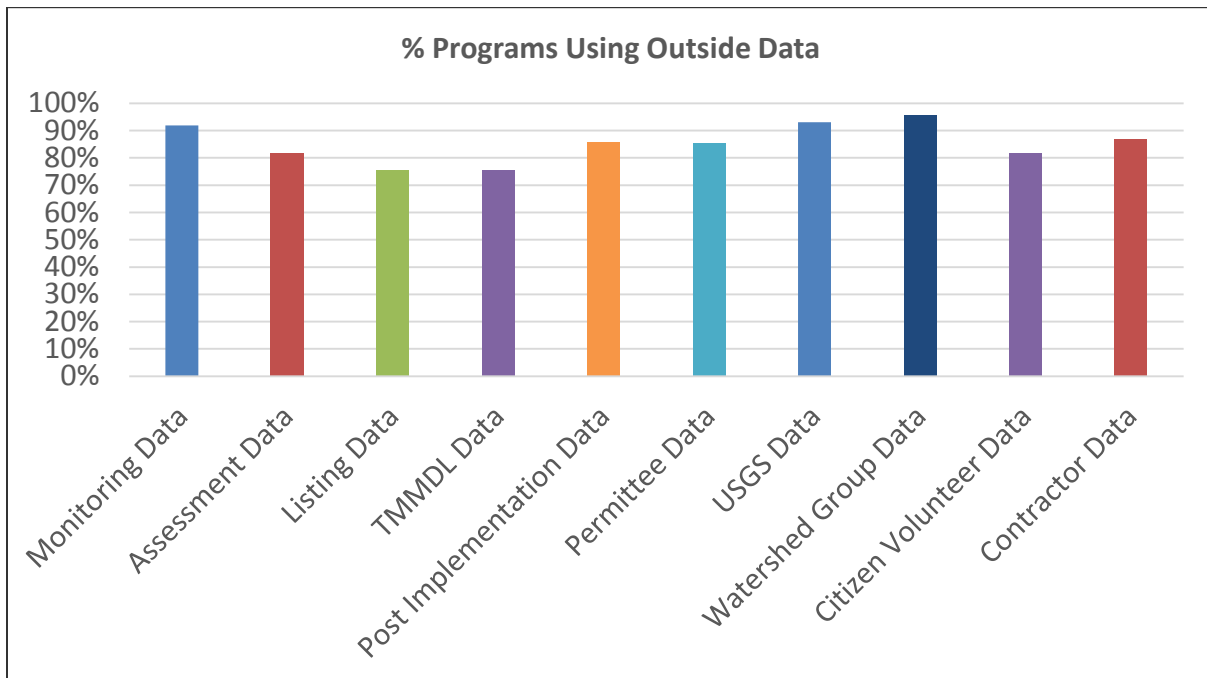


Data Collection Activities:

- About 90% of the data collected support baseline and general monitoring. With trend monitoring identified as the next most common reason to collect data. About 60% of the data is used for either developing TMDLs, following up on activities in support of established TMDLs or broadly evaluating stressors within the aquatic environment.



- About 90% of all respondents report using external data from various sources

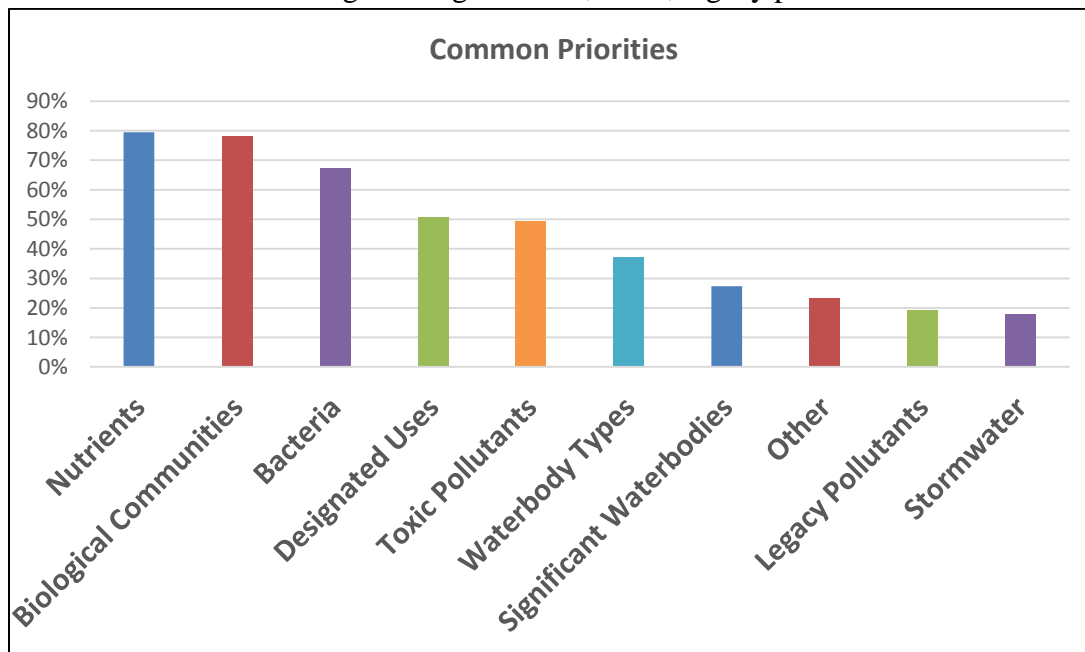


- The majority of data collection efforts are focused on the initial waterbody assessment. 60% of respondents indicated that this represented a major focus for their data collection while 37% said collecting data in support of TMDL/Alt development was a major focus.

	Major	Routine / Moderate	Minor	No Effort
	(>75%)	(25-74%)	(<25%)	0%
Initial Waterbody Assessment	60%	24%	10%	7%
Development of TMDL or Alternative	38%	39%	17%	6%
Post TMDL / Implementation Evaluation	16%	22%	50%	12%

Program Priorities:

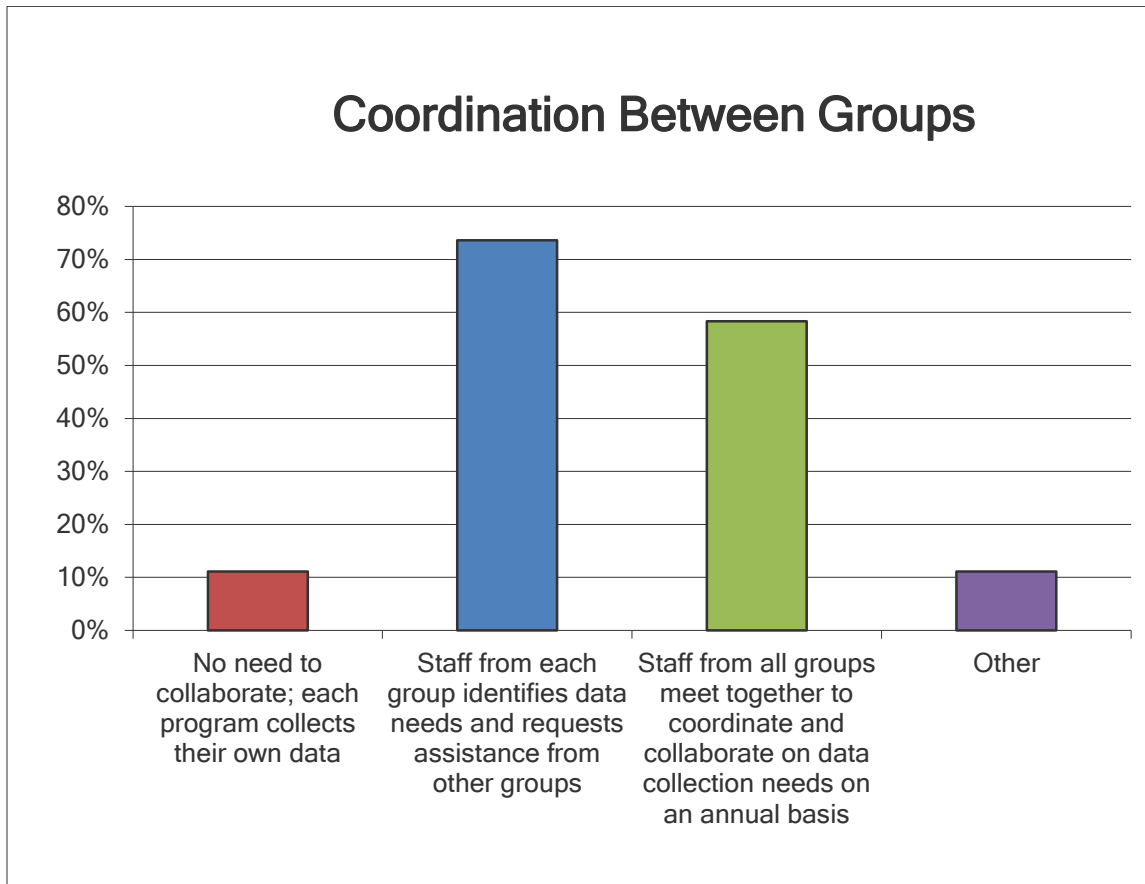
- The following program priorities were identified by the group, ranking from highest to lowest: nutrients, biological communities, bacteria, designated uses, toxic pollutants, waterbody types, waterbodies of national/regional significance, other, legacy pollutants



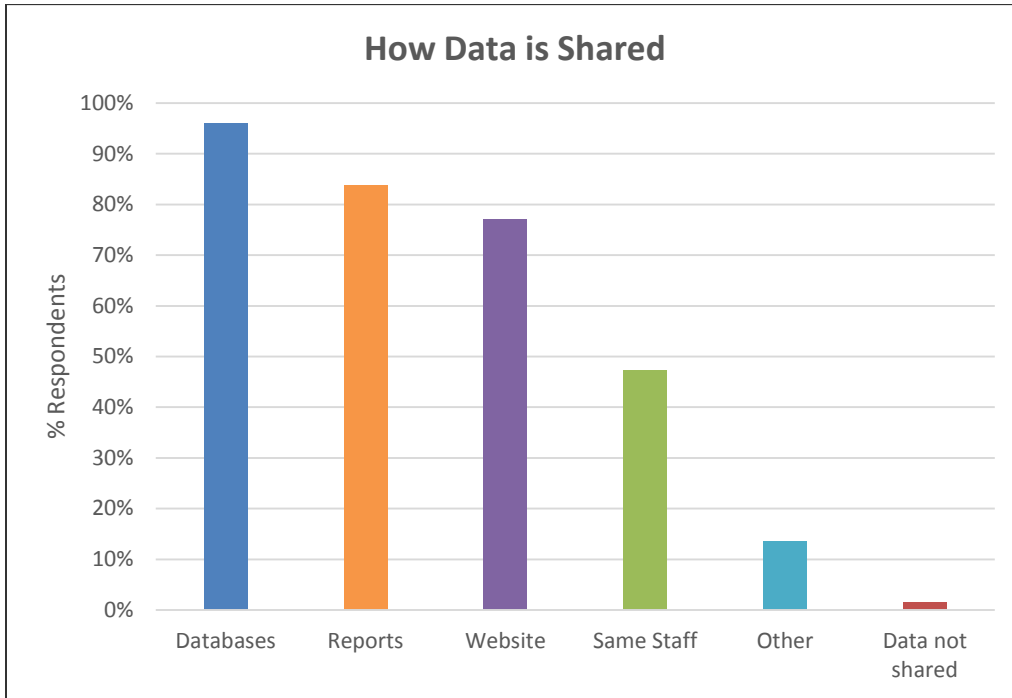
- For other priorities, respondents provided a wide variety of additional priorities including sediment, temperature, continuous data, selenium, fish tissue, dissolved oxygen, riparian corridor condition, healthy waters and harmful algal blooms.

Collaboration Activities:

- Coordination between program groups relies on collaboration. Staff from each group identifies data needs and requests assistance from other groups 74% of the time. About 59% of the time there are annual coordination meetings. Only 10% of respondents indicated that there was no need to coordinate as the programs collect data separately.

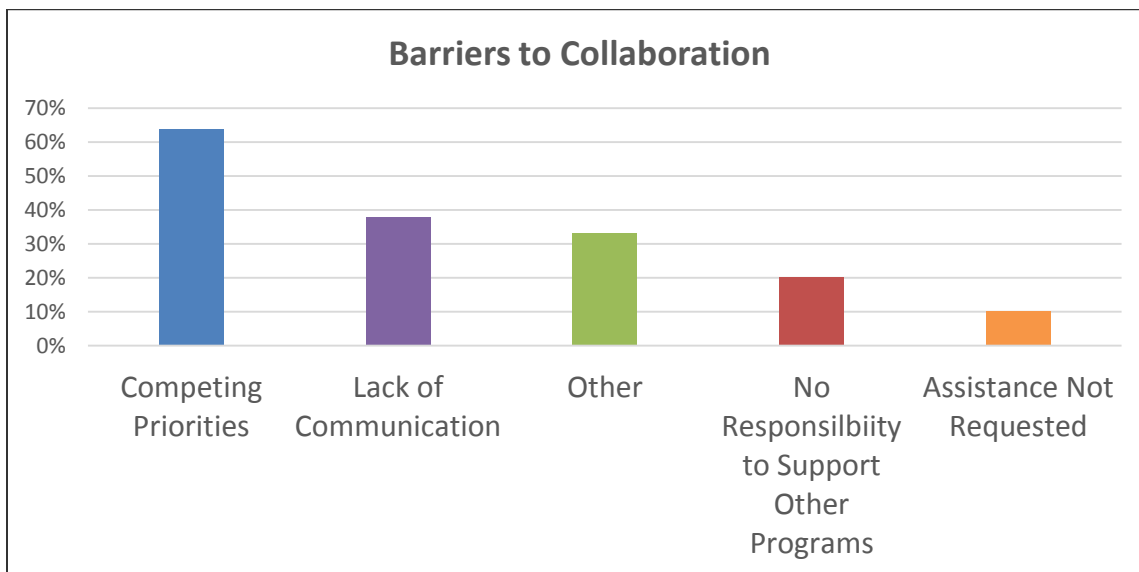


- Data sharing between groups relies mostly on sharing databases and reports. About half of the respondents indicated that the various programs share the same staff.
- Additionally, states use project teams made up of staff from the various sections to promote collaboration.
- Shared databases include both state-specific and national databases, such as GRTS and STORET.
- Personal communication and frequent inter group meetings are also important for collaboration.



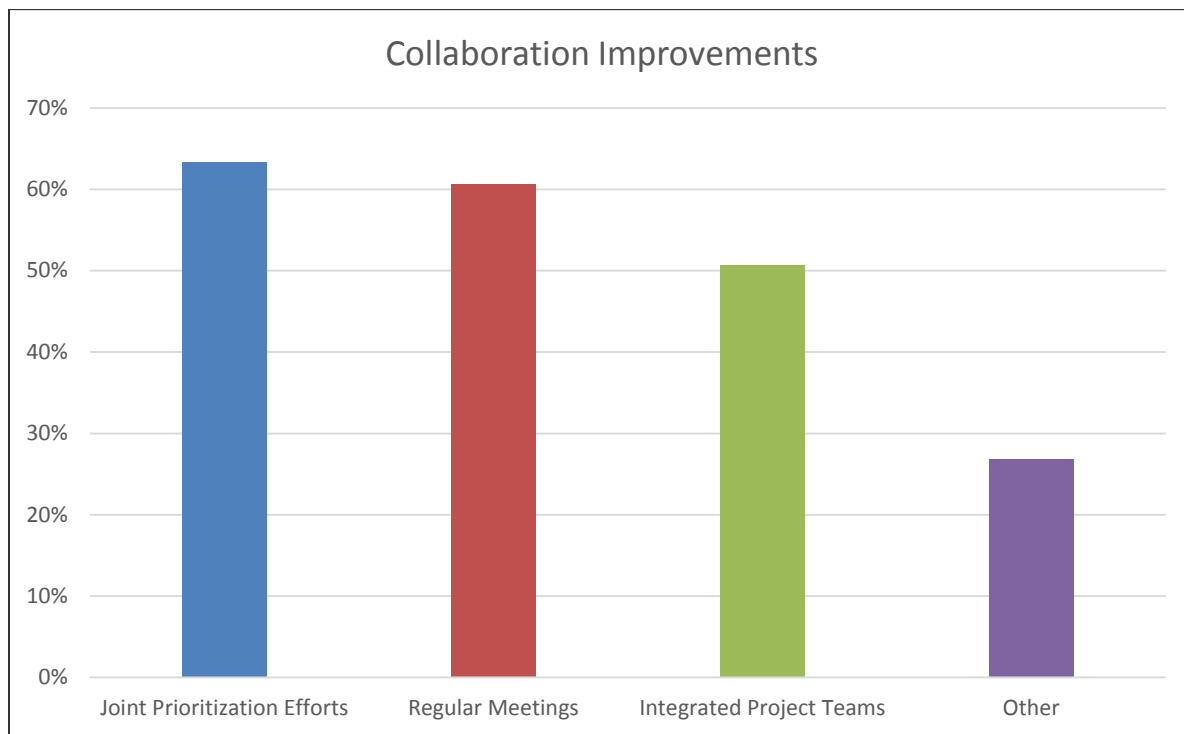
Collaboration Challenges:

- Besides staff and funding limitations, competing programmatic priorities were identified as the greatest barrier for improved collaboration by 64% of the respondents which 38% identified a lack of communication hindering collaboration. A few people indicated that there were no barriers.



- Additional barriers to collaboration include:
 - Several people reiterated:

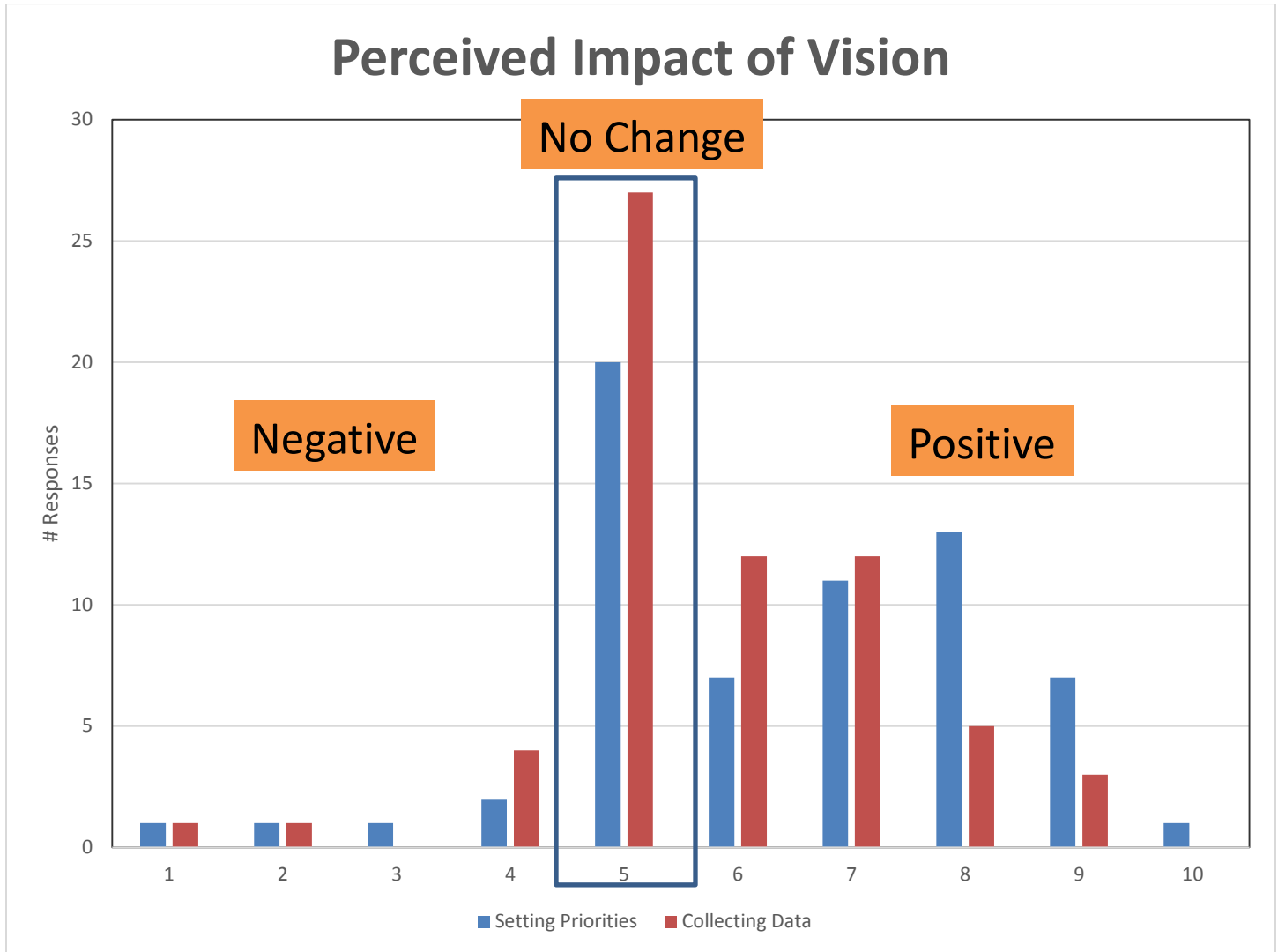
- No issues with collaboration in their state. They may be all in one collective group or have had success in working collaboratively together
 - ..that funding and staffing resources are the main barrier
 - Several people indicated that information technology organization and systems within their state pose a significant challenge. These systems don't always function as needed for provide effective data management systems. Additionally, there is insufficient technical support for these systems. Additional training for GIS would also be helpful. A recommendation was made requesting that EPA structure the federal system to better integrate data management from raw data through the ADB and on to ATTAINS to provide a single platform for managing environmental data, etc.
 - TMDLs impacted by waters where other agencies, such as municipalities or other federal agencies, have jurisdiction over addressing the impairment.
 - Lab capacity
 - Contradictory guidance from EPA
 - Frustration with the ability to implement actions to address water quality impairments and lack of commitment from implementation programs to address TMDLs, etc.
 - Need to understand that different data are collected for different reasons
 - Workload
 - No clear mechanism for addressing competing priorities
 - Lack of understanding of the interconnections between the programs
- Approaches that states have used to improve collaboration include joint prioritization efforts and regular meetings for about 60% of the respondents. States also set up integrated staff teams combining people from different programs into various project groups.
 - Other means that states have used to collaborate include:
 - Working with WQ monitoring councils to bring data collectors together to share data and quality assurance requirements.
 - Ad hoc conversations with staff seem to be working well.
 - Monitoring program staff providing comments on TMDL monitoring efforts and sample design
 - TMDL program broadly shared documents within their agency, soliciting comments prior to finalizing TMDL.
 - Program staff interact on the development of state monitoring strategies.



- Staff reiterated that regular meetings and open communication efforts are important tools.
- Direction from Agency leadership has been helpful.
- Having multiple groups collaborate together on a project.
- Close proximity of program staff and managers facilitate collaboration.

Impact of 303d Vision on Program Activities

- For setting program priorities, 30% of respondents did not expect the 303(d) Vision to change their current efforts. 62% expected a positive change with 8% expecting a negative change.
- For collecting data, 40% of respondents did not expect the 303(d) Vision to change their current efforts. 50% expected a positive change with 10% expecting a negative change.



Examples of Change:

Positive:

- 303(d) program priorities have been established on monitoring programs will use this info to identify monitoring locations for targeted watershed assessment.
- While monitoring & assessment program staff have not been engaged with 303d staff on Vision, they have increased communication within their group on defining and balancing priorities for monitoring resources.
- This will help prioritize monitoring and data collection activities in the future
- Any opportunities to increase coordination among programs are good.
- Should improve collaborations and hopefully allow for a better balancing of resources between programs, strengthen old partnerships and potentially identify new partners.
- Looking forward to greater collaboration with NPS, permits, inspections and water survey groups regarding data collection and prioritization.

- Vision is likely to result in mining the data more than in the past. Also citizen and non-agency data may be more valuable and trend analysis might also be used more.
- May result in more waters being assessed
- Will positively shift monitoring and assessment work from focusing on miles assessment to considering which miles should be assessed.
- Will provide an overall framework to serve as a state blueprint for how to monitor, assessment, prioritize and implement all of the water quality management programs within the state.
- Monitoring programs are evaluating ways to better capture data on implementation of restoration and protection projects.

No Change:

- State unable to adopt Vision at this time.
- Do not expect Vision to impact how data is collected.
- Do not know how Vision will be implemented across programs.
- Not aware of Vision or not directly involved.
- Monitoring data collection will continue to be driven by TMDL priorities.
- Vision is still being evaluated within the state for no change to data collection efforts is currently expected.
- Current balance of monitoring resources devoted to TMDL program support must be maintained to prevent negative impacts on monitoring programs.
- Monitoring programs will continue to support the TMDL program. Level of effort not expected to change although where data is collected may change based on priorities once set.
- We have a watershed approach to monitoring, data collection and assessment and that will not change.
- Underscores our collaborative prioritization process. We will deal with any constraints via an adaptive management approach.

Negative:

- 303(d) prioritization may impact state's ability to provide a comprehensive overview of water quality for the entire state.
- Vision is a distraction to the established work for the monitoring program. May be good if more funding becomes available.
- Immediate impact on monitoring design and frequency of monitoring which is challenging due to lack of sufficient lead time to incorporate changes smoothly.
- May require more resources to be expended.
- The Vision emphasizes a subset of all the TMDLs that are needed. Will there be reluctance from EPA to review non-Vision TMDLs?

Biggest concern about successfully obtaining data to support listing, development of TMDLs, alternatives or post-implementation evaluations under the 303(d) Vision

In answering this question, many of the same issues were identified as were identified in response to previous questions. The most common answers were that staff resources and funding levels were the major concern, followed by a related concern about the ability to collect the data needed to support all programs or activities that may rely on data. The ability to resolve any competing priorities or resource demands was also identified. Beyond these common responses, other concerns were:

- Understanding and implementing data collection over an appropriate scale
- Providing sufficient time to allow changing environmental conditions to be evidenced
- Needing to change current program activities
- Issues with computer and database systems.
- Addressing political and social pressures
- Needing to develop standards to support priorities

Biggest concern about successfully setting priorities under the 303d Vision

In answering this question, many of the same issues were identified as were identified in response to previous questions. The most common answers were there needs to be the ability to align priorities across various programs and obtain “buy-in” from the programs as well as the public. The ability to resolve any competing priorities or resource demands as well as having the ability to adjust to shifting priorities were also identified.