UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
WATER

MEMORANDUM

SUBJECT: NPDES Watershed Strategy Bob Perciasepe

FROM: Robert Perciasepe, Assistant Administrator
Office of Water

TO: Water Management Division Directors (Regions I-X)

The purpose of this memorandum is to build upon the discussion about the Watershed Protection Approach at our January meeting in Albuquerque, New Mexico, and to provide more detail on key action items agreed to in connection with integrating the National Pollutant Discharge Elimination System (NPDES) program into the Approach.

The Watershed Protection Approach is an Office of Water (OW) wide initiative which promotes integrated solutions to address surface water, ground water, and habitat concerns on a watershed basis. The Approach is a decision-making process that reflects a common strategy for information collection and analysis and a common understanding of the roles, priorities, and responsibilities of all stakeholders within a watershed. Its implementation is critical for the improvement of water quality in the United States, and it is therefore an essential priority for EPA's water program.

Several States have adopted a watershed protection approach and have been implementing watershed protection activities for some time. A number of other States have more recently begun to develop watershed protection frameworks, and still others are considering how they might do so in the near future. We look to these States to share their knowledge and practical experience in watershed protection implementation. The challenge for EPA is to support and facilitate this process.

There are already a number of significant Watershed Protection and related efforts being led by offices within OW, including the Office of Wetlands, Oceans, and Watersheds (OWOW) and the Office of Ground Water and Drinking Water (OGWDW). OWOW has worked extensively with EPA Regions and within EPA Headquarters to develop a comprehensive approach to watershed protection and has worked with both the States and

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Regions to champion hundreds of individual watershed pilot projects. OGWDW's efforts to protect vital ground water and drinking water supplies, most notably its support of Comprehensive State Ground Water Protection Programs (CSGWPPs) and its proposed Source Water Protection Program, reflect important related concepts. These concepts include stakeholder involvement, integrated solutions to environmental problems, and geographically based actions.

OW's goal is to fully integrate the NPDES program into the Watershed Protection Approach. While the NPDES program in several Regions has taken significant steps to implement watershed protection activities, the program nationally is as yet a largely untapped resource. The NPDES program occupies a unique position within the overall water program, since it is both a key customer and an essential partner in supporting other OW program activities and achieving many of our broader water quality goals. In order to take advantage of the NPDES program's knowledge and experience to support the Watershed Protection Approach, EPA's FY 1995 budget submittal includes a substantial and far-reaching redirection of water personnel and resources.

In the context of the larger OW Watershed Protection Approach, the Office of Wastewater Enforcement and Compliance (OWEC) has been working over the past several months with States, EPA Regions, and Headquarters offices to develop a specific strategy for a closer integration of the NPDES program into the larger OW Watershed Protection initiative. This strategy reflects the emphasis on watershed protection within the ongoing Clean Water Act Reauthorization process and is consistent with key elements of Senate Bill S. 1114 as well as the President's Clean Water Initiative. The key themes of the NPDES Watershed Strategy are refocusing permit issuance, providing technical assistance, continuing oversight activities, working with other key OW programs to build a stronger watershed partnership, and supporting new and ongoing State watershed protection efforts.

Discussion

Over the past 20 years, the NPDES program has achieved significant reductions in pollutant discharges to surface waters by focusing on technology-based, chemical-specific standards and water-quality based permit requirements. More recently, the NPDES program has included whole effluent toxicity monitoring requirements and limits, as well as an emphasis on 304(l) assessments and action plans. In addition to these activities, there are a number of new initiatives including: stormwater, sewage sludge, combined sewer overflows, implementation of additional national effluent guidelines, incorporation of sediment criteria and biocriteria, and others. The challenge for the NPDES program is managing new and existing efforts within the context of both limited resources and environmental impacts that vary from State-to-State and Region-to-Region. The Watershed Protection Approach provides an environmental management framework within which baseline program requirements and newer initiatives can be integrated to cost-effectively address remaining point source environmental impacts within a State's watersheds and support other surface water and ground water activities.

The attached Strategy addresses EPA actions that will ensure that the NPDES program supports, facilitates, and implements this Approach. While the Strategy focuses on key action items for the NPDES program, it also emphasizes critical areas in which the NPDES program must coordinate its point source control activities with the efforts of other OW offices. The Strategy reflects the recognition that, while the NPDES program will play a central environmental protection role in a number of watersheds, in many other watersheds, point sources will not represent the primary stressors. The NPDES program's main task in the latter watersheds will be to support and facilitate effective implementation activities for meeting environmental objectives (e.g., monitoring, permitting, public participation).

As outlined at the Albuquerque meeting, the NPDES Watershed Strategy consists of four parts: (1) an introduction; (2) a set of guiding principles for the Watershed Protection Approach; (3) the purpose and objectives of the NPDES Watershed Strategy; and (4) detailed strategy components. The Strategy components address State-wide coordination, NPDES permits, monitoring and assessment, programmatic measures and environmental indicators, public participation, and enforcement.

Key FY 1994 Regional Actions

There are several key Regional actions which need our attention during FY 1994. I would like to take this opportunity to provide more detail on three specific actions which the Regions must complete by September 1, 1994, to begin implementation of the NPDES Watershed Strategy in FY 1995. These actions include:

- **Regional State-by-State Assessments and Action Plans** - Completing assessments of Watershed Protection activities and needs in each State and, in the context of that assessment, developing Regional action plans for FY 1995 that identify how the Region will support and facilitate each State's movement toward the Watershed Protection Approach;

- **State/EPA Workplan Agreements** - Including specific activities within State/EPA workplans for FY 95 which will promote the central components of Watershed Protection;

- **Internal Coordination** - Developing integrated Regional strategies which will describe the Regional decision-making processes, oversight role, and internal coordination efforts necessary to ensure support for the Approach.

In assessing State watershed protection efforts, the Regions should evaluate the status of each State's watershed protection approach in the context of the NPDES Watershed Strategy and identify actions that the Region will undertake to support and facilitate the development or implementation of a comprehensive watershed protection approach in each State. EPA recognizes that many States, particularly those which have

only recently begun to consider developing a watershed protection framework, will move toward implementation of the Watershed Protection Approach in an incremental fashion. We intend to work with each State in whatever way we can to ensure progress in each of the Watershed Protection component areas outlined in the attached Strategy and to provide each State the support necessary to achieve successful implementation of the Watershed Protection Approach.

To assist the Regions in this effort, OWEC has been working with both the Regions and ASIWPCA to compile and analyze available information about the status of individual State watershed protection efforts. We are providing this preliminary information as an attachment to this memorandum. It includes a State watershed protection approach status and component matrix and fact sheets for each State about which OWEC has been able to acquire State watershed protection approach information. In addition to the OWEC State assessment effort, OWOW has assessed watershed protection projects throughout the Nation and has developed project-specific fact sheets for each State; the purpose of these fact sheets is to support the exchange of watershed protection information and promote technology transfer. This information will be provided to the Regions under a separate cover.

An appendix to the Strategy outlines a range of suggested activities for the Regions to consider in developing their action plans to support State watershed protection approaches and in negotiating their State/EPA agreements. This document is organized according to the specific NPDES Watershed Strategy components. As additional assistance to the Regions in supporting their States, OWOW is currently developing a manual which will provide guidance on developing State watershed protection programs. We will distribute this guidance as soon as it is completed.

To assure overall consistency and coordination, I am requesting that each Region provide a copy of their internal strategy, State-by-State assessments, and FY 95 NPDES Regional action plans for supporting States to OWEC by September 1, 1994. I am asking OWEC to work with other HQ offices to review the Regional internal strategies and action plans in terms of their level of specificity, interim milestones, and how well they reflect and can be expected to implement the NPDES Watershed Strategy. If you have questions or need further information about the NPDES Watershed Strategy, please do not hesitate to contact me or Mike Cook. You should feel free to contact other OW Office Directors if you have questions relating to other areas.

Attachments

WATERSHED PROTECTION

NPDES WATERSHED STRATEGY

March 1994

NPDES WATERSHED STRATEGY

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I. INTRODUCTION

The Clean Water Act (CWA) sets forth the goal of restoring and maintaining the chemical, physical, and biological integrity of the Nation's waters. The CWA also establishes a number of programs designed to achieve this goal. These programs address water quality criteria and standards, establishment of TMDLs, monitoring, technology-based and water quality-based point source permits, nonpoint source control, and wetlands protection.

The challenges faced by these CWA programs are great. There are more than 200,000 point sources (including stormwater) requiring discharge permits. An even greater number of nonpoint sources significantly contribute to pollution problems. Safe drinking water supplies must be maintained and aquatic habitats must be restored and protected. In a time of limited resources, these challenges require innovative solutions and cooperation among all stakeholders. The Watershed Protection Approach provides the necessary framework for meeting these challenges.

Overview of the Watershed Protection Approach

The Watershed Protection Approach represents EPA's renewed emphasis on addressing all stressors within a hydrologically defined drainage basin instead of viewing individual pollutant sources in isolation. It is not a new program competing with or replacing existing programs; rather, it provides a management framework within which baseline CWA program requirements, related public health concerns, and newer initiatives can be integrated to cost-effectively address restoration and protection of aquatic ecosystems. By focusing on the hydrologic basin, the Watershed Protection Approach emphasizes all aspects of water quality, including chemical and physical water quality, habitat quality, and biodiversity.

The Watershed Protection Approach emphasizes the involvement of all affected stakeholders in a drainage basin. Those concerned about the watershed and those able to take action to protect and restore aquatic ecosystems are involved in decision-making processes together. The Watershed Protection Approach also provides a framework in which to implement the principles of environmental justice. Environmental justice must be considered simultaneously with other environmental goals and objectives in a particular basin.

Finally, the Watershed Protection Approach focuses on taking comprehensive, integrated actions to address environmental priorities. The approach stresses the need for teamwork at the Federal, State, and local levels to achieve the greatest environmental improvements with the resources available.

Watershed Protection Successes and Challenges

Within the Office of Water (OW) there are a number of significant ongoing watershed protection efforts. The Office of Wetlands, Oceans and Watersheds (OWOW) has the OW lead in promoting a national Watershed Protection Approach. This approach

stresses coordination between EPA and other key stakeholders to address watershed protection in a comprehensive and integrated fashion. OWOW also works with States and EPA Regions to champion hundreds of individual watershed pilot projects. In March 1993, OWOW co-sponsored the highly successful "Watershed '93" conference in Alexandria, Virginia. This conference featured numerous opportunities to exchange information on proven and emerging watershed management techniques. OWOW's National Estuary Program employs a watershed approach for protection of estuarine waters and serves as a model for promoting the long-term involvement of all watershed stakeholders.

The Office of Ground Water and Drinking Water (OGWDW) is aggressively pursuing a complimentary approach through its Comprehensive State Ground Water Protection Program (CSGWPP), Wellhead Protection Program and proposed Source-Water Protection Program. The NPDES Strategy will be implemented in conjunction with these programs.

In addition to EPA's watershed protection activities, a number of States have adopted State-wide watershed protection approaches and have been implementing them for some time. Many other States are in the process of developing such approaches, and still others are considering how they might do so in the near future. EPA looks to these States to share their knowledge and practical experience in watershed protection implementation. The challenge for EPA is to support and facilitate this process.

OW's goal is to fully integrate the NPDES program into the Watershed Protection Approach, support development of State watershed protection approaches, and coordinate watershed protection efforts with other Federal agencies, States, Indian Tribes, and local communities. The full benefit of watershed protection can only be realized with the cooperation and coordination of all key stakeholders.

NPDES Program Role

The National Pollutant Discharge Elimination System (NPDES) program occupies a unique position within the overall water program, since it is both a key customer and an essential partner in supporting and achieving many of EPA's broader water quality goals. The NPDES program traditionally has focused on chemical-specific technology-based and water quality-based permit limits or requirements. More recently, NPDES permits have included whole effluent toxicity monitoring requirements and limits. In addition to these baseline activities there are a number of new initiatives underway including: stormwater permitting; sewage sludge permitting; combined sewer overflow (CSO) permitting; implementation of CWA §304(l); implementation of additional national effluent guidelines; and incorporation of sediment criteria and biocriteria.

The broad range of NPDES functions and activities gives the NPDES program a key role in implementing the Watershed Protection Approach. NPDES program staff are an important source of "on the ground" knowledge about the environmental impacts in many watersheds. The NPDES Watershed Strategy discusses integration of NPDES program

functions into the broader Watershed Protection Approach and areas for coordination with other stakeholders to promote implementation of the Approach.

The NPDES Watershed Strategy is divided into four sections. This introduction to the Strategy comprises Section I. Section II discusses principles that are common to any watershed strategy and Section III states the purpose and objectives of the NPDES Strategy. The heart of the NPDES Strategy is Section IV, which identifies six major watershed strategy components. These components outline specific areas in which the NPDES program can support the Watershed Protection Approach.

II. GUIDING PRINCIPLES

Development and implementation of any watershed strategy, whether at the national or State level, should be based on certain common principles. Six guiding principles are listed below. The NPDES Watershed Strategy is based upon these principles.

1. Watershed protection approaches may vary in terms of specific elements, timing, and resources, but all should share a common emphasis and insistence on integrated actions, specific action items, and measurable environmental and programmatic milestones.

2. Related activities within a basin or watershed must be coordinated to achieve the greatest environmental benefit and most effective level of stakeholder involvement.

3. Actions relating to restoration and protection of surface water, ground water, and habitat within a basin should be based upon an integrated decision-making process, a common information base, and a common understanding of the roles, priorities, and responsibilities of all stakeholders within a basin.

4. Staff and financial resources are limited and must be allocated to address environmental priorities as effectively and efficiently as possible.

5. Program requirements that interfere or conflict with environmental priorities should be identified and revised to the extent possible.

6. Accurate information and high quality data are necessary for decision-making and should be collected on an incremental basis; interim decisions should be made based on available data to prevent further degradation and promote restoration of natural resources.

III. NPDES STRATEGY PURPOSE AND OBJECTIVES

The purpose of the NPDES Watershed Strategy is to outline national objectives and implementation activities for the NPDES program to 1) integrate program functions into the broader Watershed Protection Approach and 2) support development of State-wide basin management approaches. The Strategy will be implemented consistent with CWA requirements and is not intended to supersede or impede existing watershed protection efforts; rather, it is intended to support ongoing State initiatives and supplement the efforts of other environmental programs by identifying areas to which the NPDES program can contribute and, thus, build a stronger watershed partnership.

Program Integration

A major challenge facing the NPDES program is managing its new and existing efforts within the context of both limited resources and environmental impacts and priorities that vary from State-to-State and Region-to-Region. By integrating its program functions into the broader Watershed Protection Approach, the NPDES program can effectively meet this challenge. Success in this process, however, will require program flexibility with an emphasis on environmental priorities.

Program oversight, administration, and regulations are principal areas of the NPDES program where flexibility is important for successful integration into the Watershed Protection Approach. Oversight and administrative requirements and regulations that impede such integration should be revised or eliminated, where possible.

A focus on environmental priorities allows the NPDES program to achieve the greatest environmental benefit with the maximum efficiency in use of resources. This focus allows the resources dedicated to issuing and reviewing NPDES permits to vary depending on the environmental impacts of each source. In addition, the compliance monitoring and enforcement program, in conjunction with the permitting program, can be used to address environmental priorities and further the objectives of the Watershed Protection Approach.

Support for State-wide Basin Management Approaches

In addition to program integration, another key goal of the NPDES Watershed Strategy is to promote ecosystem protection by supporting the development of State-wide basin management approaches wherever possible. The first step in building such a State-wide approach is developing a basin management framework. A State-wide basin management framework is simply an operating structure that:

- Identifies the roles and responsibilities of participating programs;
- Identifies long-term programmatic and environmental goals as well as key interim milestones;
- Divides the entire State into basins in order to focus and coordinate management activities on a geographic basis (watersheds or sub-basins

IV. NPDES STRATEGY COMPONENTS

The following components identify six essential areas which must be addressed to fulfill the objectives and purpose of this strategy. Suggested Regional action items to support these components are included as an appendix to this strategy. Where the NPDES program is not the lead program for a particular component, the action items identify specific areas where the NPDES program must coordinate with and support other OW programs to further the development and implementation of the Watershed Protection Approach.

1. State-wide Coordination

- EPA will work in partnership with States to support the development of State-wide basin management frameworks; these frameworks should reflect existing experience with programs such as 303(d), 303(e), 319, NPDES, Clean Lakes, and the National Estuary Program

- Coordinate Office of Water grants application and reporting processes to facilitate financial support for the Watershed Protection Approach

- Reference the delineated basin in which a facility is located or an activity occurs on all documents (e.g., permits, grants)

- Coordinate interstate basin efforts as appropriate

2. NPDES Permits

- Implement a methodology for issuing NPDES permits on a watershed basis (i.e., decisions about point source controls are based on an overall assessment of environmental priorities and concerns within a basin) by developing a basin management plan and:

    1) synchronize permit issuance within basins, or

    2) assure that permits are issued in accordance with the basin management plan

- Emphasize training on the concepts of watershed protection at the local, State and Federal levels

- Emphasize permit development for minors and majors that pose a significant environmental threat to a basin or watershed

- Streamline the NPDES permit development, issuance, and review process; implement key permit streamlining recommendations developed in support of the National Performance Review

- Support development of phased TMDLs as part of the permit development process as information becomes available for stressors of concern in a particular basin/sub-basin

- Support the development of NPDES permit conditions as the basis for future pollutant trading, where appropriate

- Develop and implement pollution prevention initiatives to reduce point source loadings within watersheds

- Consider the use of general permits within basins or sub-basins/watersheds where appropriate

- Target high risk basins or sub-basins for storm water industrial pollution prevention plan reviews and early implementation of more rigorous storm water permits, as necessary

- Coordinate municipal storm water and CSO permits where feasible

- Focus pretreatment resources for program development or modification, technical assistance, local limits development, and compliance actions in priority basins

- Coordinate sludge management and permitting with watershed planning and implementation activities, where feasible

3. Monitoring and Assessment

- Develop a State-wide monitoring strategy to assure the most effective targeting of limited monitoring resources and coordinate collection and analysis of NPDES, nonpoint source, and other watershed data

- Establish point source ambient monitoring requirements where appropriate to support assessment of watershed conditions; this action may provide opportunities for group monitoring plans for multiple discharges to the same basin

- Promote comparable data collection, analysis, and utilization by all stakeholders (e.g., NPDES, 303(d), 304(l), and 319) through revisions to information collection and management systems (e.g., permit applications and compliance monitoring, PCS, TMDL development, 305(b), NEP, STORET, and water body systems)

4. Programmatic Measures and Environmental Indicators

- Revise existing national accountability measures to facilitate implementation of the Watershed Protection Approach

  - Focus on minors and majors which pose an environmental threat

  - Revise permit output expectations to facilitate permit synchronization and development of basin management plans

  - Allow more flexibility to target inspection resources on high priority sub-basins

- Establish new measures of success that reflect assessment of progress toward short-term and long-term watershed protection goals (should reflect public health concerns where appropriate); these should be realistic and should include both interim environmental milestones and specific program activities

5. Public Participation

- Utilize existing NPDES public participation process and development of basin-wide management plans to encourage informed participation by watershed stakeholders including permittees, environmental groups, and the general public

- Educate dischargers, interest groups, and the public about watershed planning efforts, including upstream and downstream problems and solutions

- Seek broad public participation in identifying local environmental goals for each basin and request information from dischargers, interest groups, and the public on problems and historic trends

6. Enforcement

- Within the base national enforcement program, include emphasis on minor facilities which are discharging to a priority basins

  - Enforcement activities in priority basins will include compliance assurance, compliance monitoring, and taking administrative/judicial actions for non-compliance

- Use 308 authorities, inspections and supplemental environmental projects, where appropriate, to support watershed assessment, planning, and restoration activities and to promote pollution prevention

- Identify priority categories of unpermitted dischargers where there is evidence of potential wide-spread water quality problems in priority basins

- Modify the scope and operation of the Permit Compliance System (PCS) to include minors in priority basins and other data fields required to support information management within the watershed

Appendix (Suggested Regional Action Items) to NPDES Watershed Strategy

Regional action plans for facilitating State watershed protection approach (WPA) development must be based on State program assessments. A separate Regional action plan should be tailored for each State based on the State's status and needs to support progress in each of the six Strategy component areas.

The recommended action items listed below are specific tasks that can be included in a Regional plan. Regions should carefully consider each of these recommendations and choose those that are most appropriate for a given State or develop others based on the results of their State assessments. This State-specific approach will lead to a more rapid and effective implementation of the Watershed Protection Approach.

The list of recommended Regional action items is organized according to NPDES Watershed Strategy components, with the addition of a Funding Administration section. Within each component area, these recommendations are grouped into three categories which describe the status of State watershed programs: (1) States Without a State-wide Watershed Protection Approach; (2) States Developing a State-wide Watershed Protection Approach; and (3) States Implementing a State-wide Watershed Protection Approach. Action items that are listed in an earlier status category may be appropriate actions for States with more developed State-wide WPAs, as well.

State-wide Coordination

States Without a State-wide WPA:

- Conduct educational workshops for States as well as other stakeholders using information from other States that have developed and are implementing watershed protection approaches.
- Meet with the State to identify impediments to implementing a WPA.
- Identify and describe the areas in which program coordination will enhance water quality management activities (e.g., development of TMDLs, NPDES permit issuance efficiency).

States Developing a State-wide WPA:

- Provide a forum to States to share information on the development and implementation of a WPA (e.g., newsletter, conference calls, conferences).
- Work with States to delineate basin boundaries and establish inter-basin priorities,

ensuring that wellhead protection and existing Comprehensive State Ground Water Protection Program (CSGWPPs) priorities are considered in the decision making process. Where appropriate, utilize existing analysis reflected in the 319, 303(d), 303(e), Clean Lakes, NEP, and NPDES programs.

- Assist States with the identification of stakeholders in basins (NEPs may be of assistance in coastal areas).

- Assist States with the development of agreements/memoranda of understandings with other Federal and State agencies for the purpose of supporting the State's watershed protection approach.

- Provide technical assistance for the development of a State-wide watershed protection approach framework document; such a document includes a program description for all participating programs, agencies, and the general public.

- Assist States with the identification and recruitment of other agencies to serve as partners for the State-wide basin management framework.

- Identify the mechanisms developed to implement the State WPA (e.g., policies, regulations).

- Describe the process for involving Federal agencies, Indian tribes, and local governments.

States Implementing a State-wide WPA:

- Conduct reviews of State programs which take into account the scope and schedule of State's programs and basin plans to the extent possible.

NPDES Permits

States Without a State-wide WPA:

- Work with States to identify the number and types of dischargers in each basin.

- Work with States to sequence basins, ensuring that the permit workload is evenly distributed in any given year.

- Work with States on scheduling issues associated with synchronizing permits by basin, or on issues associated with permit issuance under the basin management plan.

- Provide guidance on mechanisms and approaches for modifying individual permits (e.g., short-term permits, administrative extensions, expedited renewal procedures, basin general permits).

States Developing a State-wide WPA:

- Assist States in developing a strategy that defines the criteria and approach for issuing permits consistent with the basin plan.

- Provide technical assistance to States for evaluating and assigning priorities to permits within a basin. These procedures will help determine the appropriate level of effort and scrutiny that should be devoted to each permit.

- Support States in assuring that Best Management Practices (BMP) established in NPDES permits are designed to prevent contamination of the State's priority ground water.

States Implementing a State-wide WPA:

- Support the development of automated permitting systems.

- Assist with the development of innovative permits that use the full potential of the basin-wide approach (e.g., trading, monitoring, pollution prevention and conservation, basin-wide general permits).

- Expand public notification to include information on permits in the basin plan.

Monitoring and Assessment

States Without a State-wide WPA:

- Help to develop a State-wide monitoring strategy involving State resources, discharger monitoring consortiums, and other Federal agencies. Assist with negotiations for shared monitoring resources.

- Assist with the development of assessment methods (consider biological and ecological criteria) and record keeping for targeting and ranking water quality problems. When assessing the status of a watershed, surface water, ground water, coastal waters, wetlands, sediments, and habitat are all factors that should be considered. The assessment of the watershed should determine if the waters are meeting their designated use, and also provide information on critical areas, endangered species habitats, and areas needing special protection.

- Identify how NPDES ambient monitoring can be incorporated with other monitoring efforts.

States Developing a State-wide WPA:

- Permits will contain ambient monitoring requirements as appropriate to support the basin monitoring plan.

- Support upgrades of information management systems, especially the use of geographic information analysis systems which facilitate analysis and display of environmental information in a geographic format.

- Help to refine and consolidate the monitoring objectives and reports of the CWA programs requiring monitoring resources (e.g., 305(b), 303 (e), CSGWPPs) to promote the targeting and ranking objectives of the watershed approach.

- Work with States to develop a State monitoring strategy that allows regions to fulfill cross program requirements through a single integrated monitoring system (e.g., stormwater, 319, TMDL, drinking water.)

States Implementing a State-wide WPA:

- Provide technical assistance to develop improved environmental indicators and monitoring strategies.

- Provide support for the development of a citizen/volunteer monitoring program

- Participate in basin water quality assessments and contribute to targeting and ranking of environmental issues.

- Design pollution prevention and restoration programs relying, where appropriate, on total maximum daily loads or permits to address impaired ecosystems. Design monitoring programs to gather additional data to allow program and project design.

Program Measures and Environmental Indicators

States Without a State-wide WPA:

- Identify areas of flexibility with existing program measures.

States Developing a State-wide WPA:

- Negotiate a consolidated reporting format for the State to satisfy CWA reporting requirements.

- Establish tracking measures to monitor implementation schedule for various components of the Watershed Protection Approach including: delineation and sequencing of basins, rescheduling of NPDES permits, development of a State-wide framework document.

- Establish key environmental indicators that will be used by State to measure progress toward achievement of both CWA and local goals and environmental objectives.

States Implementing a State-wide WPA:

- Evaluate State basin plans in a manner that is consistent with each State's watershed framework and also ensure that the plans support the goals and objectives of the CWA.

- Develop a strategy to use basin plans to implement phased TMDLs in all States.

- Develop an assessment approach for regional oversight that is geographically targeted which measures the success of watershed protection activities and provides information to the decision makers when updating basin plans.

- Encourage the development of innovative environmental indicators for each basin.

Public Participation

States Without a State-wide WPA:

- Identify and develop more efficient means of notifying the public.

States Developing a State-wide WPA:

- Promote outreach to educate the public about the NPDES program and the components of the WPA. Provide training on the inter-relationship between habitat protection, ground water contamination, drinking water source protection, nonpoint source impairment, and the point source program.

- Work with the State to establish a forum in which the public can help to identify water quality problems and establish goals for the preservation of high quality waters.

States Implementing a State-wide WPA:

- Encourage State linkages with local land use planning authorities to facilitate the use of water quality information in the planning process (e.g. EPA Region IX North Bay Initiative).

- Ensure that basin plans are written as educational documents that can be read by the lay public and which promote environmental stewardship in the basin.

- Target water quality standards hearings to watersheds.

Enforcement

States Without a State-wide WPA:

- To supplement the current information on major facilities, conduct an inventory of each priority watershed, as necessary, using traditional enforcement authorities (e.g. 308 letters or inspections) to identify minor facilities which will be required to have a permit.

States Developing a State-wide WPA:

- Use enforcement to correct violations at facilities which are causing the greatest degradation of a basin.

- Assist State in developing a State inspection strategy to support WPA. The Regions and States should develop criteria to evaluate which facilities should be inspected in a given year.

States Implementing a State-wide WPA:

- For majors and minors in priority watersheds, focus attention during report reviews and compliance screening on the completeness of the ambient quality information submitted by the permittee, as required by the permit.

- Use PCS to track loadings of pollutants in priority watersheds.

Funding Administration

*States **Without** a State-wide WPA:*

- Conduct an assessment of the funding sources. Develop plans to reduce the "overhead" burden to States in administering grants.

States Developing a State-wide WPA:

- Utilize flexible authorities to support the WPA.

States Implementing a State-wide WPA:

- Determine if basin ranking and priority setting criteria are effectively administered and allow for focusing the appropriate level of program resources to remediate the highest risk environmental problems.