

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

Dear :

I want to thank you for your efforts resulting in a successful Unified Watershed Assessment (UWA) for your state. One of the major benefits of the Clean Water Action Plan so far has been the additional funding for the states in the Clean Water Act Section 319 Nonpoint Source Grants Program that will be targeted to these assessment areas.

On June 9, 1998 the Environmental Protection Agency (EPA) and the Natural Resource Conservation Service (NRCS) published a framework for the Unified Watershed Assessments, Restoration Priorities and Watershed Restoration Action Strategies (WRAS). On August 18, December 4, and December 9, 1998, we provided guidance on the incremental Section 319 funding, UWA's, and WRAS's. In light of the time frame established for FY 1999 and FY 2000 funding and the opportunity to begin using these funds to implement restoration activities, I am clarifying Region III's expectation for WRAS's in FY 1999 and FY 2000.

It is very important for us to target the incremental nonpoint source funding to those areas and activities where it can do the most good to address the problems identified in the UWAs. However, even with the increase in funds, the 319 Program alone cannot solve all the problems identified in your UWA. The purpose of a WRAS is to ensure that a targeted, integrated and effective watershed-wide strategy is in place before watershed restoration work is undertaken. Its development is also designed to incorporate other partners and stakeholders into the project planning and implementation cycle with their expertise and resources. Use of a WRAS increases our chances of really making a difference and leveraging our resources where they will be the most effective. The intent is to provide watershed planning by integrating and targeting the resources and expertise of various state and Federal agencies to correct the diverse range of water quality problems encountered in a watershed. Incremental 319 funding is only available for projects which are shown to be necessary for the improvement of water quality, through a WRAS, and are located in Category 1 watershed, as identified through the Unified Watershed Assessment.

EPA Region III recommends that states develop WRAS's at an appropriate watershed size to address the problem at hand. Typically, this will be the 11 or 14 digit federal hydrologic unit code cataloging units with sizes ranging from approximately 20 to 60 thousand acres. We believe this size offers a clear opportunity for both local stakeholder leadership and the ability to achieve measurable water quality and natural resource goals in the short to medium term. However, states can develop WRAS's at watershed sizes consistent with other program efforts such as Clean Water Act Section 303, 314, 320 and USDA PL566, PL534 and the Environmental Quality Incentives Program (EQIP). The most significant issue a state should consider prior to selecting watershed size is the ability to link water quality and natural resource restoration accomplishments to the problems identified in the Unified Watershed Assessment (UWA). When a WRAS or multiple smaller WRAS's are fully implemented (the goals and objectives are achieved), the watershed identified in the UWA should be moved from a UWA Category 1 watershed to Category 2.

A WRAS does not have to be a completely new document. You may have an existing document, e.g., from one of those programs mentioned above, that includes some or all of the information. In addition, WRAS development can be an iterative process. The December 4, 1998 guidance goes on to state that "If the critical components of a Watershed Restoration Action Strategy (WRAS) that address nonpoint source pollution has been developed and are ready for implementation, but the full Strategy (which may also address additional natural resource goals) is not yet complete, the state or territory may begin funding those components while it completes development of the Strategy in accordance with a schedule and process described in the work plan for the supplemental Section 319 funds."

The development of a WRAS requires a commitment of Federal, state, and local resources along with the appropriate time to fully secure local stakeholder support. To assist in the development of these strategies, states are authorized to use up to 20 percent of their incremental Section 319 allocation. Other than WRAS development option, the rest of the incremental 319 moneys must be used for WRAS implementation. Each watershed where states expect to use Section 319 funds to implement restoration activities will at a minimum have a preliminary WRAS developed in FY 1999.

We expect to begin awarding the incremental funding by mid-May, but will not release restoration funding for individual projects until after a preliminary WRAS (which provides a link for 319 project implementation funds to the larger watershed restoration goals) has been received. In order to expedite the grant award process, a grant condition is being developed as part of your FY 1999 grant award that will allow drawdown of funds against only those projects that have a preliminary WRAS, which meets the criteria described in the attachment, with a schedule for completion or a completed WRAS. The information requested with a preliminary and full WRAS is outlined in the attachment titled, "Elements of a Watershed Restoration Action Strategy."

We expect full WRAS's to be completed during FY 2000 in order to direct future Clean Water Action Plan related funding. We have been discussing these issues with your staff members over the past several months, and are confident that these expectations can be met. We will be further discussing the development of WRAS's, FY 2000 funding, management plans, and coastal nonpoint source programs at our annual states nonpoint source meeting here in Philadelphia on May 19 and 20.

If you have any questions on this letter or any of the guidance documents please call Joseph T. Piotrowski at (215) 814-5715 or have your staff call (**Program Manager**) at (215) 814-XXXX, your Section 319 EPA program manager.

Sincerely,

Thomas J. Maslany, Director  
Water Protection Division

Enclosure

## **Elements of a Watershed Restoration Action Strategy**

1. ***Public outreach method(s) --***

Preliminary WRAS - Describe generally what process will be used to engage and maintain public and governmental (local, state, Federal, and tribal) involvement.

Full WRAS - Specific processes to involve stakeholders. The public outreach method(s) should include a process for interagency coordination and continuous public involvement.

2. ***Monitoring & evaluation activities --***

Preliminary WRAS - A general discussion of the types of monitoring and evaluations to assess progress toward achieving water quality goals and, if necessary, additional monitoring needed to further refine problems.

Full WRAS - A specific discussion on how the monitoring and or evaluation will capture project implementation and link the implementation back to achieving the established goals and objectives.

3. ***Clearly defined water quality goals/natural resource concerns to be addressed --***

Preliminary WRAS - Specific water quality problems and the leading causes should be discussed. General water quality goals should be discussed along with program implementation objectives. A broad discussion on the relative contributions of each point and nonpoint source should be provided.

Full WRAS - Specific water quality and natural resource goals should be identified. Goals should be measurable and related to the water quality and natural resource concerns. Water bodies identified on a state's Section 303(d) list should be identified and an estimated time frame for the development of TMDL's should be included.

4. ***A blueprint of the actions to be taken to achieve water quality/natural resource goals --***

Preliminary WRAS - Includes a schedule and outline of the process on how the blueprint will be developed. A linkage for any proposed NPS Section 319 projects and how they will assist in achieving the goals/objectives.

Full WRAS - The blueprint should include a clearly defined course of actions to be taken relating to achieving the desired water quality goals (e.g., implementation of source water protection program tasks, TMDL implementation, etc.). A clear outline of how all technical, financial, and education program objectives/components will be applied to achieve the goals.

5. ***Implementation Schedule --***

Preliminary WRAS - Includes a schedule and outline of the process on how the schedule will be developed.

Full WRAS - Linked to each objective and identifies lead agencies responsible for each objective and action. The schedule should recognize the need to report implementation successes in the 2000 report.

6. ***Funding Needs --***

Preliminary WRAS - Includes a schedule and outline of the process on how the funding needs will be identified.

Full WRAS - This should include 319 funding, other Federal agency assistance, state funds, and other resources needed to support the implementation and maintenance of restoration measures.