End of Year Water Program Evaluation Template: ADEQ SFY21

CWA: Integrated Report and TMDLs

The Standards, Monitoring and Assessment Unit, and the Watershed Improvement Unit implement the CWA 303(d) and CWA 305(b) Integrated Report (IR) or "Assessment," and the TMDL programs respectively. The IR describes surface water quality across the state and identifies waters not meeting standards as impaired. The CWA requires states to take action to improve water quality in impaired waters by calculating and reducing pollutant loads through TMDLs or other means. CWA 106 grant funding is provided via the Workplan to support these efforts.

Program Performance

Over the past year ADEQ maintained a very limited TMDL program, focused on TMDL implementation rather than development of new TMDLs. However, the program did make progress in completing previously delayed workplan tasks including data summaries and one draft TMDL.

Following performance concerns raised last year, ADEQ delivered previously overdue data summaries on Davidson Canyon, Alum Gulch, and Mule Gulch to EPA. ADEQ also delivered a long-delayed draft of the Pinto Creek copper TMDL. EPA provided written high-level feedback to ADEQ identifying fundamental deficiencies in the draft TMDL. While EPA is encouraged by the completion of the above, ADEQ's cessation of work on the Queen Creek, Upper San Pedro River, and other TMDLs is a remaining concern. We have shared these concerns with ADEQ management and understand that ADEQ plans to increase investment in TMDLs and where appropriate, TMDL alternatives.

Last year ADEQ worked to improve integration of ADEQ's Known Ongoing Unauthorized Impacts (KOUI) program into the TMDL and Assessment programs. EPA and ADEQ also established regular cross-programmatic working meetings with the NPS, WQS, and TMDL programs. The meetings have enabled more effective communication and fostered greater understanding regarding linkages between CWA program requirements and ADEQ's existing programs.

EPA is encouraged to see the continued incorporation of TMDL and implementation site monitoring efforts and other effectiveness monitoring into the Sampling Analysis Plan (SAP), as well as the use of the SAP in planning with other CWA programs. ADEQ's continued cross program coordination on monitoring plans and needs is foundational to water quality program function.

ADEQ has also made strides toward timely submission of the combined 2020/2022 Integrated Report (IR). During the past year, ADEQ developed a milestone-driven timeline which included specific milestones for EPA feedback at early stages. This open communication has allowed for clearer understanding regarding ADEQ's plans for the IR. ADEQ also expeditiously resolved issues with data flow to the Water Quality Data Exchange (WQX). In early 2021, ADEQ identified issues that prevented data from effectively flowing into and from WQX. After working with EPA Headquarters, the issue was resolved in May. ADEQ conducts statistically valid surveys as part of its monitoring program, this often takes the form of the Arizona Fish Consumption Advisory Program (AFCAP). Statistical surveys provide valuable data for IRs, which ADEQ has in the past incorporated into their IRs or requested EPA assistance. As the IR ATTAINS database matures, ADEQ should continue to incorporate their statistical survey data and findings into the Arizona IR through ATTAINS.

Federal Funding

☐ No federal funding

☒ PPG funded (CWA 106 (partial): $1,899,000)

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☐ Stand-alone grant (funding amount)

Stand-alone grant:

1. Are drawdowns commensurate with workplan commitments? ☐ Yes ☐ No

If no, please explain:

2. Is there a ULO concern? ☐ Yes ☐ No

If yes, please explain:

Highlights & Concerns

Highlights:

1. ADEQ established a milestone-driven timeline and workplan commitments for timely delivery of 2020/2022 IR.

2. Cross-program meetings with NPS, WQS, and TMDLs provided a platform to better communicate and understand linkages between these programs and ADEQ's needs, including the incorporation of the KOUI program within TMDL implementation and monitoring.

Concerns:

1. EPA continues to be concerned about ADEQ's lack of an effective TMDL development program and strategy to address its impaired waters. These concerns arise from the cessation of work on Queen Creek and Upper San Pedro River TMDLs last year, and the lack of clarity in the purpose and execution of the Pinto Creek TMDL draft.