



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF WATER

September 27, 2013

MEMORANDUM

SUBJECT: Reducing Reporting Burden under Clean Water Act Sections 303(d) and 305(b)
Final Report

FROM: John Goodin, Chief Watershed Branch \s\
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Assessment and Watershed Protection Division,
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TO: CWA 303(d) Coordinators Regions 1 – 10
CWA 305(b) Monitoring Coordinators Regions 1 - 10
Association of Clean Water Administrators
Environmental Council of the States

We are pleased to provide you with the Final Report “Reducing Reporting Burden under Clean Water Act Sections 303(d) and 305(b)”. The primary driver for this effort was a request by a number of States for EPA to evaluate whether a change in the length of the reporting cycle from two years to four or five years would reduce State burden.

EPA commenced a series of meetings with State partners that first identified key steps in the IR process, followed by discussions focused on those steps involving the highest level of effort on States. These steps included: 1) State review and use of available data to make assessment decisions, 2) State preparation of data and associated geospatial information and entry into an assessment database, 3) State preparation and submission of final 303(d) lists and 305(b) reports to EPA, and other relevant documentation, 4) State preparation or refinement of its assessment and listing methodology, and 5) State response to public comments. During each discussion, EPA requested State input on a series of questions, including how a change in the length of the reporting cycle would help or not help alleviate State burden. At the conclusion of these meetings, while a few States indicated that EPA should lengthen the reporting cycle, the majority of States recommended that EPA not change the length of the reporting cycle.

As a result of this joint EPA and State effort, EPA does not intend to change the length of the reporting cycle, specifically for 303(d) lists; however, EPA will develop a plan to implement key recommendations outlined in this report, as well as identify opportunities within the existing framework to streamline the 305(b) reports. EPA will also work with ACWA to develop a plan to implement the key State recommendations. The State and EPA recommendations are technical in nature and focus on improvements for the 303(d) and 305(b) programs. A few of the recommendations will need to be addressed via a workgroup, such as the Monitoring and Assessment Partnership, while other recommendations are being addressed by initiatives currently underway, such as the Integrated Reporting Georeferencing Pilot and the EPA internal review of its role in 303(d) list reviews.

EPA would like to thank the Association of Clean Water Administrators (ACWA) and the Environmental Council of the States for representing State concerns on reporting burden under Clean Water Act (CWA) Sections 303(d) and 305(b). EPA looks forward to ensuring that reporting under CWA Sections 303(d) and 305(b) is accomplished efficiently while not compromising our obligations to provide the public with scientifically sound, accurate, and timely information on the status of the Nation's waters. If you have any questions or comments concerning this memorandum, please contact me or have your staff contact Shera Reems at 202-566-1264 or reems.shera@epa.gov.