



Call for Change – Monitoring

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A. How Clean Are the Nation's Waters? A State-Driven Solution to Answer a National Question

The Association of State and Interstate Water Pollution Control Administrators (ASIWPCA) has developed a set of recommendations believed necessary to maintain and continue to improve the water quality in the United States. This "Call for Change: Water Quality Improvement in the 21st Century" is an invitation to the Federal government to reestablish an effective partnership and forge a new course of action to protect and improve the nation's water resources. ASIWPCA looks forward to an on-going constructive dialogue with the US Environmental Protection Agency (EPA), the incoming Administration, and interested stakeholders to meet this challenge.

General Overview and Background:

The States fully support the need for Congress, the EPA, and Office of Management and Budget (OMB) to have a valid national assessment of the status of the nation's waters. The public rightly deserves good information on how the Clean Water Act (CWA) is working. States stand ready to provide valid scientific information that can be used to craft a national picture of the nation's waters, and are eager to improve their capacity for both water quality monitoring and assessment.

Reason for Change:

However, this cannot be done under the current framework of punitive funding formulas, EPA-required methods, or substantial disconnects between the monitoring information being collected nationally and management decisions to improve water quality that are made by States and/or river basin compacts. The current approach diverts scarce resources from essential monitoring that is required to support all water quality management programs.

Recommendations:

- Redirect the FFY 07-08 \$18.5 million appropriation for the National Monitoring Survey to direct more funds to create and maintain well-designed State-driven monitoring and assessment programs.
- EPA should convene a joint workgroup with States across program offices (including monitoring, assessment, and standards personnel) with authority to jointly craft national and State monitoring and assessment priorities.
- State monitoring strategies should identify how funds can best be used to improve their programs.

- EPA should develop scientifically valid assessment tools, such as the Biological Condition Gradient, for use by States and regional organizations for habitat and watershed assessment and translation of State monitoring data into valid national assessments.
- EPA should develop and maintain flexible, adaptable sampling protocols that are appropriate at the State or regional level.
- States should be able to design probability-based surveys where they see the most value vs. EPA mandating them.
- EPA should minimize use of contractors to collect national survey data and redirect funds to States to build monitoring and assessment capacity.
- EPA should base recurrence intervals for national surveys on appropriate response intervals for waterbody types.
- EPA should promote reporting of national, regional and State probability survey results where there are calibrated Biological Condition Gradient tiers established by States.

B. More Effective Monitoring and Data Collection through Partnering

General Overview and Background:

Information on the quality of the nation's water resources, if they are improving or declining, and whether they meet scientifically sound standards for various designated uses is the foundation of effective water management. States view water monitoring as the BASE of the pyramid. A good understanding of the status of the nation's waters and effectiveness of regulatory and other clean water related programs requires adequate water quality information at State, regional and national scales. This information drives results-based water resource management.

The CWA requires States to develop water quality standards appropriate for their waters and to test their waters for compliance with these standards. States are also mandated to conduct monitoring to develop a targeted list of impaired waters, Total Maximum Daily Loads (TMDLs) and other watershed protection plans, and to carry out and evaluate implementation. Monitoring may also be needed to develop standards and for other required actions such as spill response. Each State has a unique mix of information needs to be filled by its monitoring program, based on the waterbody types present, the numbers and types of sources of impairment, and the requirements of the State's water quality standards. Numerous Federal agencies also conduct monitoring for various purposes and multiple interstate and State/Local organizations may be involved in a given State.

The EPA guidance document "*Elements of a State Water Monitoring and Assessment Program*" (EPA, March 2003) clarifies the water resources and the types of monitoring expected of States including testing of chemical, physical, microbiological, biological and habitat parameters in rivers, streams, lakes, ground water, reservoirs, wetlands, estuaries, and ocean waters. The States have developed monitoring strategies that follow the EPA guidance and lay out both their current programs and needed improvements. The strategies, which are developed with input from the EPA Regions, represent "road maps" toward filling the States' water quality information needs.

Reason for Change:

With so many mandates and needs for water monitoring information, it is not surprising that the gap between available resources for State monitoring and the needs is wide and growing wider. In 2002, the resource gap for all water quality management programs was estimated by States and ASIWPCA to be about \$800 million¹ -- \$200 million of which related to monitoring.

The shortfall in monitoring resources must be addressed both through increased funding and by making the most efficient use of available resources. State/local, regional and national water monitoring programs require a true, efficient partnership to meet water information needs of all participants at these geographic scales.

Recommendations:

- Congress should increase Federal funding for water monitoring at the State level to build capacity and help leverage monitoring conducted at all levels, including volunteer or citizen monitoring.
- EPA should promote internal cross-program understanding of the need for different State monitoring designs to meet the various Federal monitoring mandates.
- States and Federal agencies should work together to provide ready access to data inventories and better capabilities for data exchange across water monitoring data systems. EPA should continue to provide funding for these efforts.
- Federal agencies should support national and State monitoring councils designed to promote coordination, collaboration and communication of water monitoring data and information. This includes funding as well as other resources.
- EPA should use methods such as Tiered Aquatic Life Use (TALU) to enable biological monitoring results to be compared across regions and the nation. Biological monitoring should be tailored to ecoregions and waterbody types.
- Congress should increase support for US Geological Survey (USGS) water quality monitoring programs, including restoration of the NASQAN network which provided long term data from sites throughout the country, e.g. for assessment of water quality trends.

NOTE: *Throughout this document reference to States also refers to Interstate Water Pollution Control Agencies.*

For more information on ASIWPCA's Call for Change, go to www.asiwPCA.org

¹ *State Water Quality Management Resource Analysis – Interim Report on Results*, ASIWPCA, April 2002