



February 25, 2020

Ms. Edwina Vogan
Regional Water Quality Planning Coordinator
Arizona Department of Environmental Quality
Surface Water Permits Unit
Mail Drop 5415A-1
1110 West Washington Street
Phoenix, Arizona 85007

Dear Ms. Vogan,

As the Designated Planning Agency (DPA) for water quality in Pima County since 1974, Pima Association of Governments (PAG) Regional Council approved the PAG Areawide Water Quality Management Plan (208 Plan) on January 30, 2020. The Statewide Water Quality Management Working Group (WQMWG) recommended approval of the PAG 208 Plan update to the Arizona Department of Environmental Quality (ADEQ) on February 18, 2020. It is now requested that the ADEQ Director approve the PAG 208 Plan, certify that it is consistent with the State of Arizona's Water Quality Management Plan, and submit the plan to the U.S. Environmental Protection Agency for approval.

Requirements

PAG coordinates watershed planning for the prevention of water pollution within Pima County, excluding Native American lands, in accordance with Section 208 of the Clean Water Act under 40 C.F.R. § 130.6. The PAG 208 Plan contains required components including descriptions of the municipal and industrial waste treatment, nonpoint source management and control, management agencies, implementation measures and groundwater conditions. Required construction priorities for waste treatment facilities are referenced in documents managed by the local Designated Management Agencies (DMAs). DPA responsibilities also include facilitation of public participation in the regional planning process (25.7 of 40 CFR). PAG's public participation strategies are outlined in the policies and procedures chapters. In addition, DPAs are responsible for providing technical assistance to applicants in the 208 planning process. This is addressed through PAG's procedures for facility consistency, including Amendments. Finally, a Strategic Action Plan format was utilized in the 208 Plan (Appendix A) to identify key local needs and priorities for funding considerations.

Also referenced in the plan are required elements that ADEQ covers in separate documents including effluent limitations and Total Maximum Daily Loads (TMDLs). Arizona regulates wastewater discharges through both individual and general permits and requires that they meet certain effluent limitations. All permits must comply with Arizona's water quality standards. If the ADEQ determines that the federal effluent limitations are inapplicable, the limitations are determined on a case-by-case basis. ADEQ administers and enforces the Arizona Pollution Discharge Elimination System (AZPDES) permit program in Arizona. When a surface water is found to be impaired, a TMDL study is developed by ADEQ. ADEQ monitors and labels surface waters or portions of surface waters that do not meet the established allowable TMDLs set for that body of water.

Updates

PAG developed its original 208 Plan in 1978. In 2006 the plan was updated to integrate numerous amendments and inventory updates. This 2020 plan is the second comprehensive update to the original plan. As required, the 208 Plan was updated to maintain a minimum 20-year planning horizon, reflect current water quality conditions, and document progress on past recommendations. It presents the identified recommendations based on water quality problems identified in the latest 305(b) assessment report to help direct implementation measures. In addition, PAG and ADEQ set a goal to streamline the 208 Plan document and procedures. The 208 planning processes, while streamlined, maintain a means for stakeholders to engage in regional environmental decision making and help facilitate coordination

among jurisdictions. The process is intended to assure EPA and ADEQ that regional coordination and agreements are in place prior to ADEQ approval of AZPDES permits and Aquifer Protection Permits.

Key proposed changes in the PAG 208 Plan

- Shorter, clarified procedures, with fewer procedure triggers, especially for regional public systems.
- Updated water quality data for streams, groundwater, drinking water, CAP, reclaimed, effluent, and stormwater.
- New action plan format to address regional water quality goals. Goals were updated based on local progress and alignment with local issues and ADEQ priorities.
- Incorporation of 3 Amendments since 2006 and updated wastewater service information.
- Allowance for administrative updates to content in appendices.
- Modernized data inventories into an online, interactive GIS portal to ease the application process and support Consistency Reviews.
- Updated population and flow projections out 20 years
- New appeal process.
- New designation type available for private companies to have DMA-like responsibilities, called Wastewater Management Utilities, using models from other DPA 208 Plans.
- Clarified DPA coordination across county lines.

Proposed increases to fees for all Consistency Reviews and for private facility Amendments to allow true cost recovery. Proposed fees align with the average fees collected by other DPAs. Fees have not increased since 1984.

These aspects of the PAG 208 Plan are unchanged

- No policies were added or changed.
- No treatment plants were modified to a degree that would have triggered an Amendment during the update of this PAG 208 Plan.

Participation Process

Timeline

- ADEQ and the other DPAs within Arizona have been consulted throughout the process.
- DMAs – Town of Marana, Pima County and Town of Sahuarita – have been involved at each stage of development.
- PAG gave and hosted several presentations to the Watershed Planning Subcommittee (WPS), Environmental Planning Advisory Committee (EPAC), and interested parties (totaling approximately 300 recipients) about state regulatory updates and local programs to address water quality conditions that have informed the plan update. The first draft of the plan was released in Feb. 2019 for formal stakeholder feedback, which has been incorporated.
- Oct. 18, 2019 – WPS and EPAC approved the second draft at a joint meeting.
- Dec. 13, 2019 – 45-day legal notice of the public hearing began.
- Dec. 31, 2019 – Documents were available for public review 30 days before the public hearing.
- Jan. 30, 2020 – Public comment period ended. Following a public hearing, PAG Regional Council approved the proposed PAG 208 Plan to be forwarded to ADEQ.
- Feb. 18, 2020 – PAG presented the draft 208 Plan to the Statewide WQMWG and members voted to forward it to ADEQ with a recommendation of approval.

Feedback

In general, the feedback on content and structure was positive. There was support for streamlining procedures and recommendations to maintain local coordination points and public notice/hearing for public facilities. Clarification was provided for some procedures. Private facilities provided updates for the facility inventory. Jurisdictions, organizations and agencies were supportive of program summaries, water quality data, and recommendations for goals and actions and provided additional content for each of those areas.

Documents

The 2019 Draft PAG 208 Plan, detailed list of changes and documentation of the participation process can be found on PAG's Watershed Planning Subcommittee webpage: www.PAGregion.com/208plan

- Changes are listed in the Record of Changes in chapter 1 of Appendix B to facilitate the approval process by clearly describing the differences in the content and the streamlined processes.
- The Public Participation Records in chapter 4 of Appendix B includes documentation of compliance with EPA Advisory Group composition, a summary of developmental input by the advisors, the legal advertisement and official affidavit of publication for the notice of public hearing with a list of locations where documents are available for viewing, the notice to the interested parties, the interested parties contacted and participants lists, the public comments and PAG responses, and meeting agendas, memos and minutes from each stage of approval.

PAG 2020 Areawide Water Quality Management Plan, including appendices:

- [PAG 208 Plan: Adopted Policies and Procedures \(Feb 2020 DRAFT\)](#)
- [Appendix A: Water Quality Management \(Feb 2020 DRAFT\)](#)
- [Appendix B: PAG 208 Planning Background \(Feb 2020 DRAFT\)](#)
- [Appendix C: Glossary and References \(Feb 2020 DRAFT\)](#)
- [Draft 208 Wastewater Facility Inventory Portal](#) (online interactive mapping database)

Thank you in advance for your assistance. If you have any questions, please contact me at 208info@pagregion.com or call (520) 792-1093 x4464 for information.

Sincerely,

Mead Mier
PAG Sustainability Coordinator

c: Dave Atler, Deputy Director, PAG, DAtler@PAGregion.com