

ARIZONA NONPOINT SOURCE MANAGEMENT PLAN (FY26 to FY30)

JULY 1, 2025 - JUNE 30, 2030

*Strategic planning for meeting water quality
protection and restoration goals related to
nonpoint source pollution*

SEPTEMBER 2025

Our Mission and Vision

To protect and enhance public health and the environment in Arizona

Through consistent, science-based environmental regulation; and clear, equitable engagement and communication;

With integrity, respect, and the highest standards of effectiveness and efficiency;

Because Arizonans treasure the unique environment of our state and its essential role in sustaining well-being and economic vitality, today and for future generations.

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Acronyms

ADEQ	Arizona Department of Environmental Quality
AZPDES	Arizona Pollutant Discharge Elimination System
BMP	Best Management Practice
CWA	Clean Water Act
EPA	United States Environmental Protection Agency
FY	Fiscal Year
GRTS	Grants Reporting and Tracking System
HAB	Harmful Algal Bloom
NPS	Nonpoint Source
NPS Program	Arizona's Nonpoint Source Program
NWQI	National Water Quality Initiative
OAW	Outstanding Arizona Water
TMDL	Total Maximum Daily Load
USDA	United States Department of Agriculture
WIFA	Water Infrastructure Finance Authority of Arizona
WOTUS	Waters of the United States

Section 1. Summary

This Nonpoint Source Management Plan (Plan) serves as an update to Arizona's Nonpoint Source (NPS) Management Program, which was initially established under the Clean Water Act (CWA) Section (§) 319(h) during 1989-90 and has since been revised every five years. According to United States Environmental Protection Agency (EPA) guidance, states are expected to periodically review and evaluate their NPS Programs and assess goals and objectives, as appropriate.

The NPS Program helps states establish priorities for addressing nonpoint source pollution while guiding programmatic efforts toward these objectives. This Plan outlines both short- and long-term goals, strategies, and objectives aimed at reducing and preventing nonpoint source pollution in Arizona's surface waters and groundwater. The intended duration of this Plan is from July 1, 2025 (start of FY26) to June 30, 2030 (end of FY30), after which it will undergo a reevaluation and revision as needed.

Section 2. Background

I. The Clean Water Act

Enacted by Congress in 1972, the CWA lays the foundational framework for regulating discharges of pollutants into the "Waters of the United States" (WOTUS) and quality standards for surface waters¹. In 1987, Congress amended the CWA by enacting §319(h), which established a national program to control nonpoint sources of water pollution. §319 directs EPA to provide states, territories, and tribes with guidance and grant funding to implement their NPS programs. State NPS programs can include a wide variety of activities including regulatory or nonregulatory programs, technical assistance, financial assistance, education, training, technology transfer, watershed projects, and monitoring to assess the success of specific NPS implementation projects².



II. Nonpoint Source Pollution

While the CWA does not provide a precise definition of nonpoint source pollution, it identifies it as any form of water pollution that does not qualify as a "point source" under §502(14) of the act.

¹ epa.gov/laws-regulations/summary-clean-water-act

² epa.gov/sites/default/files/2016-10/documents/nps_program_highlights_report-508.pdf

NPS pollution generally results from land runoff, precipitation, atmospheric deposition, drainage, seepage or hydrological modification. Unlike pollution from industrial and wastewater treatment plants (i.e., point sources), NPS pollution comes from many diffuse sources and is caused by rainfall or snowmelt moving over and through the ground. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, and groundwater³.



Figure 1. Illustrations of nonpoint and point source pollution along with elements of the hydrologic cycle. Developed by the EPA, Office of Water, Nonpoint Source Program

III. Components of a Nonpoint Source Management Program

In 2012, EPA published the "Key Components of an Effective State Nonpoint Source Management Program" document, outlining the fundamental elements necessary for a robust state NPS management program. This Plan specifically emphasizes activities undertaken by the Arizona Department of Environmental Quality (ADEQ) that are funded through the EPA's Clean Water Act §319 grant. The accompanying table identifies the required components of the NPS Plan and specifies where each component is addressed within this document.

³ epa.gov/nps/basic-information-about-nonpoint-source-nps-pollution

Table 1. Key Component Crosswalk Analysis

<i>EPA NPS Plan Component</i>	<i>Arizona NPS Plan Section</i>
The state program contains explicit short- and long-term goals, objectives and strategies to restore and protect surface water and groundwater, as appropriate.	Section 5
The state strengthens its working partnerships and linkages to appropriate state, interstate, tribal, regional, and local entities (including conservation districts), private sector groups, citizen groups and federal agencies.	Sections 4 & 5; Appendix A
The state uses a combination of statewide programs and on-the-ground projects to achieve water quality benefits; efforts are well-integrated with other relevant state and federal programs.	Sections 4 & 5
The state program describes how resources will be allocated between (a) abating known water quality impairments from NPS pollution and (b) protecting threatened and high quality waters from significant threats caused by present and future NPS impacts.	Section 5
The state program identifies waters and watersheds impaired by NPS pollution as well as priority unimpaired waters for protection. The state establishes a process to assign priority and to progressively address identified watersheds by conducting more detailed watershed assessments, developing watershed-based plans and implementing the plans.	Section 5
The state implements all program components required by §319(b) of the Clean Water Act, and establishes strategic approaches and adaptive management to achieve and maintain water quality standards as expeditiously as practicable. The state reviews and upgrades program components as appropriate. The program includes a mix of regulatory, non-regulatory, financial and technical assistance, as needed.	Sections 4 & 5
The state manages and implements its NPS management program efficiently and effectively, including necessary financial management.	Sections 4 & 5
The state reviews and evaluates its NPS management program using environmental and functional measures of success and revises its NPS management program at least every five years.	This document

Section 3. Water Quality in Arizona

I. Clean Water Act §305(b) and §303(d) Integrated Report

CWA §305(b) and §303(d) mandate that ADEQ conduct a biennial assessment of Arizona's surface waters, evaluating their health against established standards. Following EPA

guidance, ADEQ combines these requirements into an Integrated Report. Multiple Integrated Reports will be compiled during the planning period, with updated information available on [ADEQ's website](#).

II. Nonpoint Sources of Pollution

The 2024 Integrated Report identified *Escherichia coli* (*E. coli*), copper, selenium, mercury (in fish tissue), acidity (pH), and zinc as the top surface water impairments in Arizona.

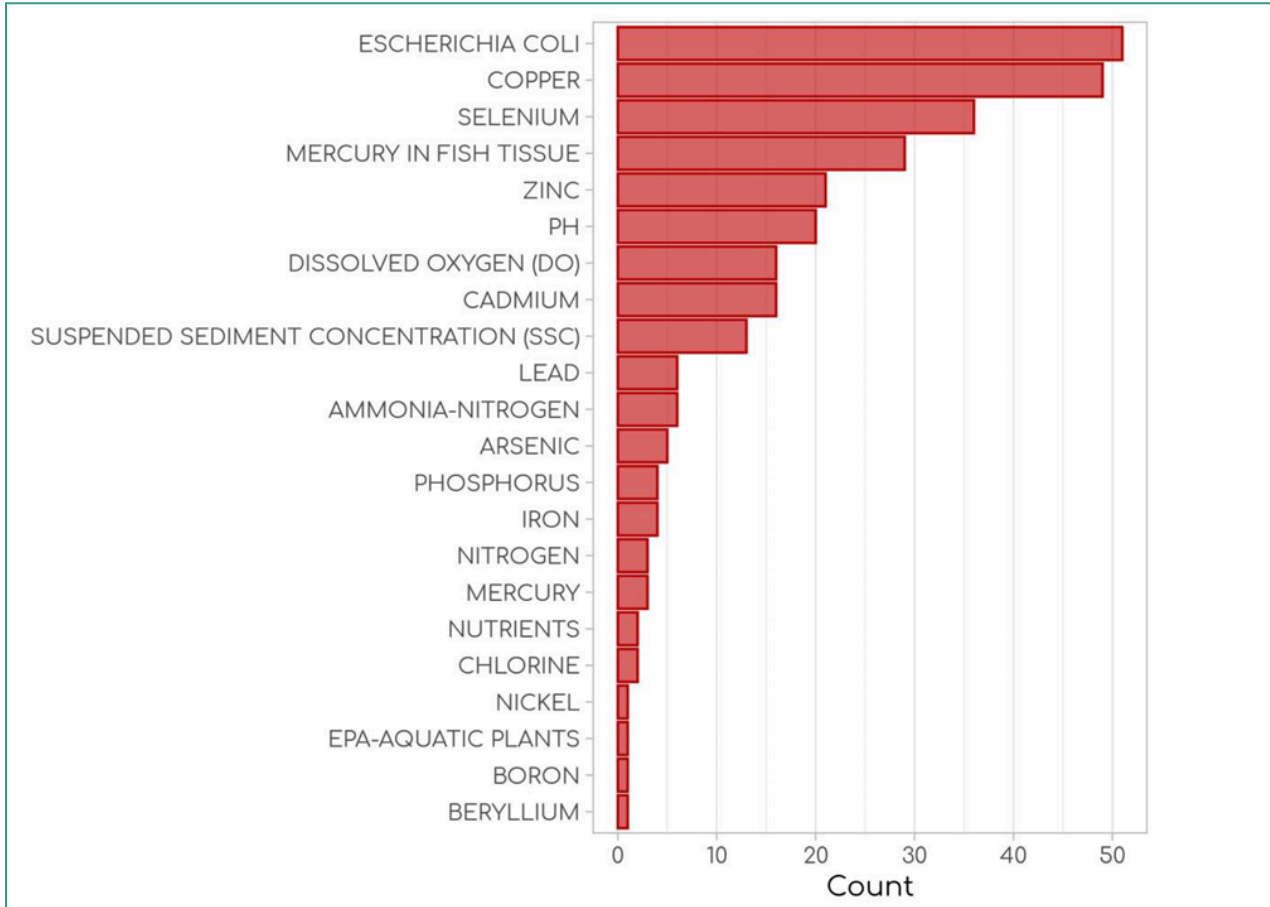


Figure 2. Causes of Impairment (2024)



Slide Rock State Park, Arizona

Sources of *E. coli* can vary depending on the location of the waterbody, land use, and precipitation patterns. Some common nonpoint sources of *E. coli* include: leaking septic tanks, human and pet waste in recreated streams, agricultural runoff (livestock and fertilizers), and urban stormwater.

Groundwater and surface water in many regions of the state exhibit natural mineralization, a condition that can be intensified by abandoned mining sites. These sites, which have been inactive for decades and predate modern environmental regulations, often feature tailings or waste rock piles that contribute to nonpoint source pollution.

Mercury found in fish tissue typically originates from atmospheric deposition linked to industrial activities, although it can also occur naturally. Atmospheric deposition, a nonpoint source of mercury, comes from numerous diffuse sources and migrates great distances where it is later deposited into surface water bodies.



Humboldt Mine adit, Santa Cruz County

The complexities of various natural and anthropogenic processes can make it challenging to truly identify sources of NPS pollution. However, novel sampling technology and procedures are becoming more available to governmental and local agencies and nonprofits that work hard to reduce NPS pollution. An example of a novel sampling technology is microbial source tracking (MST), also known as a DNA study. MST can be used in surface waters impaired by *E. coli*, to help identify the source by looking for genetic markers unique to species such as humans, cows, and other animals.

Section 4. Arizona's NPS Management Program

I. What Influences ADEQ's Goal Development?

Arizona's implementation of the federal NPS Management Program is vital for safeguarding the chemical, biological, and physical integrity of surface waters. This mission is particularly critical in Arizona's arid climate, where water resources are limited. The pervasive nature of NPS pollution presents significant challenges, making it difficult to address all needs within a five-year timeframe. To effectively manage these challenges, ADEQ develops targeted goals and prioritizes watersheds based on current data and information.



The main goals of the 2025-2030 NPS Five Year Plan are:

- Maintain and grow partnerships to leverage knowledge and resources
- Improve water quality through targeted NPS mitigation projects
- Protect attaining waters by identifying NPS threats
- Explore alternate funding sources to complement federal funding
- Analyze surface water quality data to determine primary sources of NPS pollution

II. Project Selection & Prioritization

ADEQ prioritizes Section 319 grant-funded projects by their expected outcomes and their ability to reduce contamination in streams that are impaired for the most common parameters identified in the Integrated Report. Projects can also aim to enhance waters that are attaining (meeting) standards. Ideally, projects take on a holistic watershed approach that incorporates best management practices that improve water chemistry, physical stream characteristics, wildlife habitat, and protect public health.

Projects may be identified by ADEQ staff or proposed by external entities. Regardless of how projects are identified, they must address the prioritization factors described above.

This NPS Five Year Plan aims to provide enough flexibility in how projects happen in order to maximize positive outcomes for public health and the environment. ADEQ aims to balance projects that are internally prioritized and implemented via private consultants with projects that are proposed to the Agency and implemented via sub-awarded non-private entities.



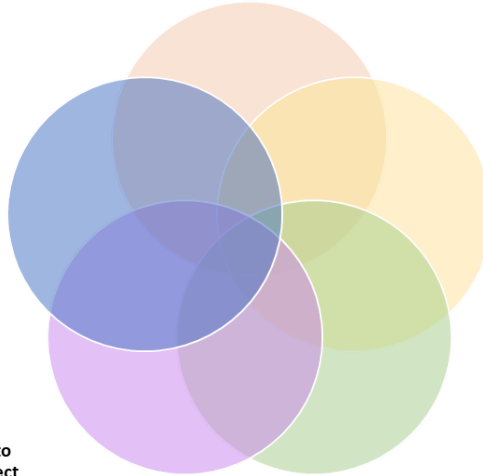
White-Nosed Coati thrive in oak- and sycamore-lined canyons, lower-elevation riparian areas and mountain forests.

III. Cross-program Coordination

The very nature of NPS pollution necessitates interdisciplinary practices and cross-collaboration among CWA programs.

Various water quality monitoring programs help quantify the health of Arizona’s waterways. This monitoring data is compiled into the Integrated Report, which helps the state prioritize where NPS mitigation projects should take place and what attaining waters may need protection.

Permits developed in the Arizona Pollutant Discharge Elimination System (AZPDES) for various industries and operations enforce standards and practices that reduce contamination in waterways.



NPS mitigation projects are measured by their ability to reduce contamination so that a waterbody can attain standards set by the state and approved by EPA.

NPS mitigation projects are implemented on the ground to reduce contamination or protect attaining waters.

Watershed plans and Total Maximum Daily Loads are developed to guide project implementation efforts.

Figure 3. Arizona’s NPS goals are achieved via the coordination of many programs

Additionally, other state agencies work alongside ADEQ to mitigate NPS pollution and provide funding resources. Key collaborators include the Arizona Water Infrastructure Finance Authority and the Arizona Water Protection Fund. The [Arizona Community Science Alliance](#) also plays a crucial role in protecting waterways from NPS pollution by engaging volunteers who collect vital stream samples, remove litter, and monitor for Harmful Algal Blooms (HABs). HABs occur when algae grow out of control and pose a health risk to humans and wildlife. While numerous factors contribute to HABs, increased nutrient loadings (mainly phosphorus and nitrogen) and pollution from nonpoint sources are known to play a role⁴.

For a comprehensive list of entities working diligently to protect our watersheds, please refer to **Appendix A**.



Arizona Community Science Alliance youth protecting Arizona lakes with an enthusiastic trash clean up.

⁴ noaa.gov/what-is-harmful-algal-bloom

IV. Measuring Success

Each goal described in the Strategic Planning Table in Section 5 is associated with specific strategies that will be implemented to achieve measurable outcomes over the next five years. When determining the overall success of these outcomes, the following are considered:



Pet Waste Station along Oak Creek, Arizona



Three R Mine Remediation

- One key indicator of success is the removal of impaired waters and/or parameter impairments from the CWA §303(d) list. Although ADEQ’s goal is to completely restore or delist waters, they may require several projects or years for that to occur.
- EPA Performance Measures

NPS reductions in nitrogen, phosphorus, and sediment - As part of its ongoing efforts to combat nutrient pollution in US waterbodies, EPA tracks the estimated annual reduction in millions of pounds of nitrogen and phosphorus and tons of sediment from NPS to water bodies. Load reductions achieved under CWA §319-funded projects are an indicator of project success and must be reported to EPA annually. ADEQ reports required nitrogen, phosphorus, and sediment reductions on an annual basis via EPA’s Grants Reporting and Tracking System (GRTS), and in the NPS Annual Report.



Hillside Mine remediation led to provisional delisting for beryllium, manganese, pH, copper and zinc.

Waterbodies with primarily NPS-impairments restored - EPA tracks the number of water bodies identified by states (in 2000 or subsequent years) as being primarily NPS-impaired that are partially or fully restored as a result of restoration efforts. NPS Success Stories are the primary gauge of the national NPS Management Program success. By “fully restored”, EPA means that all designated uses are now being met. By “partially restored”, EPA means either of the following two conditions are being met:

- A waterbody that has a use that is initially impaired by more than one pollutant, but after restoration efforts meets the criteria for one or more (but not all) of those pollutants; or
- A waterbody that initially has more than one use that is less than fully supported, but after restoration efforts, one or more (but not all) of those uses becomes fully supported. The measure includes not only water bodies restored by 319-funded projects, but all primarily NPS-impaired water bodies that a state fully or partially restores, regardless of funding source.

Given the time required for the restoration of impaired water bodies, ADEQ may establish additional metrics to assess project success. These could include, but are not limited to: number of streams improved, acres remediated and/or restored, percent reduction in parameter exceedances, and number of streams now supporting some designated uses.

V. Reporting

Nonpoint Source Management Program Annual Report

Frequency: Once each state fiscal year (July 1 through June 30).

Content: The NPS Annual Report discusses ADEQ's progress toward meeting the goals and annual milestones of the NPS Five-Year Plan. In addition, the NPS Annual Report contains project highlights from the fiscal year, as well as pollutant load reduction estimates from the preceding year. The latest Annual Report can be found on ADEQ's [website](#).

Grants Reporting and Tracking System (GRTS)

Frequency: Project details - semi-annually; estimated load reductions - annually, by March

Content: EPA's GRTS is the NPS Management Program's primary tool for project reporting, data collection, and records maintenance. GRTS houses information on where NPS projects are being implemented, how effective projects are at meeting goals, and highlights success stories⁵. The CWA requires each state to report reductions in NPS pollutant loadings to EPA on an annual basis. ADEQ project managers are responsible for entering these estimates into GRTS for all projects implemented during the previous calendar year. For example, the estimated pollutant load reductions for calendar year 2024 would be submitted to GRTS by March 2025⁶.

Project Reporting

Frequency: Project-specific, but no less than quarterly

Content: Sub-grantees and contractors utilizing §319 grant funding are expected to submit status reports to ADEQ that include updates on the project budget and timelines, progress

⁵ epa.gov/nps/grants-reporting-and-tracking-system-grts

⁶ epa.gov/system/files/documents/2024-06/2024_section_319_guidelines_final_1.pdf

toward achieving project goals, and progress toward meeting established deadlines. These reports provide the information that the ADEQ project manager needs to update the project details in GRTS, evaluate whether the project is on track or not, and ensure consistent expenditures of funding.

Grant Work Plans

Frequency: Yearly

Content: In order to award §319 funding to states, EPA requires work plans with budgets to be submitted for review and approval. These work plans anticipate expenditures and projects that will be assigned to the grant and are used to measure progress throughout the five-year grant period. The Annual Reports mentioned above provide a mechanism to report on progress.

Satisfactory Progress Determinations

Frequency: Yearly

Content: Annual Satisfactory Progress Determinations are required to be issued by EPA under Clean Water Act §319(h)(8). EPA may award §319 funds only if EPA determines the state has made satisfactory progress toward meeting the schedule of milestones specified in the state's NPS Plan during the previous fiscal year. These determinations are made by EPA via a letter sent to states.

Water Quality Assessment

Frequency: Every two years

Content: The Integrated 305(b) Assessment and 303(d) Listing Report (Integrated Report) details the status of surface water and groundwater quality in Arizona. The Integrated Report contains a list of Arizona's impaired surface waters (Category 5) and those that are not attaining standards (Category 4—surface waters previously designated as impaired for which either a Total Maximum Daily Load (TMDL) has been approved or a plan is being implemented to attain water quality standards). This report fulfills requirements of the CWA §305(b) (assessments), §303(d) (impaired water identification), §314 (status of lake water quality), and §319 (identification of NPS impacts on water quality). Information concerning this program and the latest assessment and impaired waters list can be found on ADEQ's [website](#).



A mine adit at the historic Poland-Walker Tunnel continuously discharges into nearby Big Bug Creek, which is impaired for cadmium and zinc. Monitoring equipment at the mouth of the tunnel is capturing flow data, turbidity, and other parameters to help with the eventual remediation design.

Section 5. Arizona’s Nonpoint Source Management Program Strategic Plan

ADEQ seeks to implement a balanced approach to reducing NPS pollution that protects attaining waters while also addressing existing water quality problems. This Plan defines the NPS Management Program’s priorities over the next five years and describes how resources will be allocated to achieve the mission of Arizona’s NPS program:

To achieve and maintain water quality standards through the reduction of nonpoint source pollutant contributions to Arizona’s surface and groundwater.

Strategic planning begins with the end in mind by establishing broad goals. Strategies are then selected to achieve each goal. Definable milestones that function as measures of success are then developed for each strategy to direct implementation of the Plan and to evaluate success. Milestones will be monitored and results analyzed to document whether and how well desired outcomes were achieved.

The Strategic Planning Table (**Table 2, see next page**) outlines the goals, strategies, and milestones for this NPS five-year planning period.

The Strategic Planning Table (Table 2)

Goal 1: Maintain and grow partnerships to leverage knowledge and resources					
Strategy 1: Build upon existing partnerships					
Milestones	FY26	FY27	FY28	FY29	FY30
1. Continue to use inter-agency agreements with federal land managers to implement watershed improvement projects	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Sub-award NPS funding to non-governmental organizations to implement watershed improvement projects	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Expend NPS funding for private/for-profit entities to implement watershed improvement projects	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Seek opportunities to visit NPS projects on Tribal land and collaborate with tribes to learn about their programs and practices, as available	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5. Continue to offer support for the National Water Quality Initiative (NWQI) with the United States Environmental Protection Agency (EPA) and United States Department of Agriculture (USDA)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Strategy 2: Partner with the Arizona Community Science Alliance to increase public awareness of NPS pollution and how the public can help mitigate it					
Milestones	FY26	FY27	FY28	FY29	FY30
1. Attend at least one (1) outreach event to educate the public on what NPS pollution is and ways to reduce it	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Identify streams that need effectiveness monitoring after project implementation and enlist community scientist volunteers to conduct sampling	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Sub-award a non-governmental organization participating in the Arizona Community Science Alliance to implement a watershed project	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strategy 3: Expand engagement efforts in communities where project are actively being implemented					
Milestones	FY26	FY27	FY28	FY29	FY30
1. Engage in and/or facilitate community clean-up events to encourage direct action and awareness of NPS pollution. Include/Highlight metrics and outcomes from engagement activities in the NPS annual report.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Participate in conferences, community events, seminars, and other opportunities to share knowledge and build relationships that further NPS projects	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Use social media to encourage environmentally responsible behavior and to educate people on NPS pollution	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Expand ADEQ's current NPS webpage to be more educational and a resource for the public and partners. On ADEQ's current NPS webpage, include ADEQ's process for prioritizing waterbodies/watersheds and share current priority watersheds and project areas.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Goal 2: Improve water quality through targeted NPS mitigation projects					
Strategy 1: Balance direct-funded projects with sub-awarded projects					
Milestones	FY26	FY27	FY28	FY29	FY30
1. Implement targeted NPS mitigation projects	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Strategy 2: Continue to implement projects that address top impairment parameters using data from ADEQ's Clean Water Act Assessment Dashboard					
Milestones	FY26	FY27	FY28	FY29	FY30
1. Implement high-priority projects in <i>E.coli</i> -impacted watersheds	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Implement high-priority projects in metals-impacted watersheds	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Implement projects in other watersheds identified as high priority by ADEQ, as applicable	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Strategy 3: Explore solutions that improve watershed health for all Arizonans, visitors, and wildlife					
Milestones	FY26	FY27	FY28	FY29	FY30
1. Conduct an analysis that identifies impaired waterbodies that have not received Clean Water Act §319 funding and project implementation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Implement a NPS mitigation project in a watershed that has not previously received Clean Water Act §319 funding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Measure the success of the implemented project, including pollutant load reductions and other benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Strategy 4: Make data-driven decisions regarding the projects the program implements to maximize time, energy, and resources that enable the best outcomes					
Milestones	FY26	FY27	FY28	FY29	FY30
1. Measure the effectiveness of watershed projects by collecting surface water and soil samples, as applicable	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Measure pollutant load reductions resulting from projects and report to EPA and the public via EPA's Grants and Reporting Tracking System (GRTS)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Use technology and tools to gather and interpret data to make informed decisions on projects	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Develop and submit at least one (1) NPS Success Story to EPA via GRTS	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5. Identify other ways of measuring project success and share via EPA NPS Success Stories	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

The Strategic Planning Table Cont.

Goal 3: Protect attaining waters by identifying NPS threats					
Strategy 1: Expand NPS projects in attaining watersheds that are at risk of exceeding protective surface water quality standards					
Milestones:	FY26	FY27	FY28	FY29	FY30
1. Develop a process for project implementation within an attaining waterbody or Outstanding Arizona Water (OAW) that aims to build resiliency	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Establish a predictive model and prioritization structure to identify watersheds that are at risk of exceeding surface water standards; prioritize those watersheds that have existing watershed-based plans or total maximum daily loads (TMDLs) that would allow them to be eligible for NPS funding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strategy 2: Implement projects to protect attaining waterbodies from degradation, including OAWs					
Milestones:	FY26	FY27	FY28	FY29	FY30
1. Implement protection projects in prioritized attaining, at risk watersheds	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Goal 4: Explore alternate funding sources to complement NPS funding					
Strategy 1: Identify and apply for external federal and state grants that can support NPS projects and provide additional state match funding for NPS grants					
Milestones:	FY26	FY27	FY28	FY29	FY30
1. Develop a system to track yearly external grant opportunities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Develop a grant writing and application process that can expedite ADEQ's application to external grants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Identify and apply for one (1) external grant	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Goal 5: Analyze surface water quality data to determine primary sources of NPS pollution					
Strategy 1: Monitor and evaluate surface water quality data to guide source identification and effective project implementation					
Milestones:	FY26	FY27	FY28	FY29	FY30
1. Conduct a review of existing surface water quality data, TMDLs, watershed management plans, and information from any other applicable sources to better understand known nonpoint sources of pollution and identify where data gaps may exist. Make any findings or results available online on the existing NPS webpage.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. As surface water data is collected each year, update the source contributions derived from Milestone 1 above.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Use GIS or other mapping technology to visualize surface water quality data in relation to certain attributes (e.g., septic systems, abandoned mines, AZPDES, etc.) to identify facilities or properties that may be contributing nonpoint sources of pollution to nearby surface water bodies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ADEQ recognizes that the [Strategic Planning Table](#) may require updates during the five-year planning period to accommodate changes in resources, evolving priorities, enhanced strategies, or regulatory adjustments. Any amendments to this Plan will be made in consultation with EPA, and the revised version will be made available on the ADEQ [website](#).

Section 6. Get Involved

We all have a part in reducing contamination in our rivers, lakes, and streams. Invite others to get involved with reducing NPS pollution and being part of the solution!

- Volunteer with Arizona Community Science Alliance and sample streams: azdeq.gov/ScienceAlliance
- Protect watersheds by following Leave No Trace principles: azdeq.gov/OakCreek
- Ensure your business or operation obtains the necessary permits: azdeq.gov/Environmental-permits
- Learn about the health of Arizona’s waterbodies with EPA’s How’s My Waterway: mywaterway.epa.gov
- Want to engage with staff in our NPS Management Program? Email: legacymines@azdeq.gov

BE AN OAK CREEK Caretaker

1 Protect WATERSHEDS

Oak Creek is part of a watershed. That means anything we do in this area, on the creek or not, can end up in the water. Things like human waste cause E. coli contamination. Trash can leave plastic pollution. All of these things harm the plants and animals that live here. Use restrooms and pack out all trash, including dog poop and diapers, to a trash can.

2 HAVE A Poop plan

Poop in the form of human waste, pet waste, or diapers can pollute water and gross out other visitors. Have a plan for what to do with poop. Use the restrooms provided. Remain patient with land managers making improvements to restrooms to meet the needs of visitors. Have a plan for packing out diapers and dog poop all the way to a trash can.

3 Trash YOUR TRASH

Everything we bring with us, we should bring back out. This includes trash, even fruit peels, nut shells, and other food waste. Orange peels can last 2 years, while aluminum cans can last 400, and plastic never completely goes away. Trash can make wildlife sick and change their habits. Leave No Trace and pack everything out to a trash can.

4 STICK TO Trails

Marked trails are built for us to use. They give us a place to explore while leaving the rest of the landscape intact for wildlife and plants to flourish. Leaving the trail can damage plants, stress out wildlife, and put us in a dangerous position. Stick to the trail to stay safe and Leave No Trace.

PRODUCED IN PARTNERSHIP WITH

OAK CREEK WATERSHED COUNCIL | ADEQ Arizona Department of Environmental Quality | LEAVE NO TRACE | SEDONA CHAMBER OF COMMERCE & TOURISM BUREAU | ARIZONA STATE PARKS & TRAILS | U.S. DEPARTMENT OF THE INTERIOR | CITY OF SEDONA | EPA APPRECIATEAZ

Appendix A. Entities Addressing NPS Pollution in Arizona

Federal Government Agencies

- Army Corps of Engineers
- Bureau of Land Management
- Bureau of Reclamation
- Environmental Protection Agency
- Farm Service Agency
- Fish and Wildlife Service
- Forest Service
- Geological Survey
- Natural Resources Conservation Service
- Park Service

Tribes

- Ak-Chin Indian Community
- Cocopah Indian Tribe
- Colorado River Indian Tribes
- Fort McDowell Yavapai Nation
- Fort Mojave Indian Tribe
- Fort Yuma Quechan Tribe
- Gila River Indian Community
- Havasupai Tribe
- Hopi Tribe
- Hualapai Tribe
- Kaibab Band of Paiute Indians
- Navajo Nation
- Pascua Yaqui Tribe
- Pueblo of Zuni
- Salt River Pima-Maricopa Indian Community
- San Carlos Apache Tribe
- San Juan Southern Paiute Tribe
- Tohono O'odham Nation
- Tonto Apache Tribe
- White Mountain Apache Tribe
- Yavapai-Apache Tribe
- Yavapai-Prescott Indian Tribe

State Government Agencies

- Department of Agriculture

- Game and Fish Department
- Department of Forestry and Fire Management
- Geological Survey
- State Mine Inspector
- Department of State Parks and Trails
- Department of Transportation
- Water Infrastructure Authority
- Department of Water Resources

Statewide Organizations and Universities

- Arizona Association of Conservation Districts
- Arizona State University
- Colorado River Basin Salinity Control Program
- Grand Canyon University
- Northern Arizona University
- University of Arizona

Watershed Groups, Conservation Organizations, and Private Entities

- Altar Valley Conservation Alliance
- Aravaipa Watershed Conservation Alliance
- Arizona Conservation Corps
- Arizona Cross-Watershed Network
- Arizona Land and Water Trust
- Arizona Public Service (APS)
- Borderlands Restoration Network
- Boy Scouts of America
- Cienega Watershed Partnership
- Conservation Legacy
- Daric Knight – Knight Environmental
- Desert Botanical Gardens
- Escalante River Watershed Partnership
- Friends of Saguaro National Park
- Friends of Sonoita Creek
- Friends of the Agua Fria River

- Friends of the Forest
- Friends of the Rio de Flag
- Friends of the Santa Cruz River
- Friends of the Verde River
- Gila Watershed Partnership
- Grand Canyon Trust
- Keep Sedona Beautiful
- Lower Gila River Collaborative
- Lower San Pedro Collaborative
- Lower San Pedro Watershed Alliance
- McDowell Sonoran Conservancy
- National Forest Foundation
- Oak Creek Watershed Council
- Prescott Creeks Preservation Association
- Queen Creek Watershed Working Group
- Salt River Project (SRP)
- Sentinel Landscape Restoration Partnership
- Sierra Club

- Sonoita Creek Watershed Working Group
- Sonoran Institute
- The Nature Conservancy
- Upper Agua Fria Watershed Partnership
- Upper San Pedro Partnership
- Watershed Management Group

Internal (Department of Environmental Quality)

Water Quality Division

- Drinking Water
- Groundwater Protection
- Surface Water Protection
- Surface Water Quality Improvement

Waste Programs Division

- Remedial Projects/Site Remediation
- Solid and Hazardous Waste

Air Quality Division

Appendix B. Public Engagement

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ) RESPONSE TO PUBLIC COMMENTS ON THE DRAFT ARIZONA NONPOINT SOURCE PROGRAM FIVE YEAR PLAN TO REDUCE POLLUTION IN ARIZONA'S RIVERS, LAKES, AND STREAMS

The Arizona Nonpoint Source (NPS) Program Five Year Plan (the Plan) is required by Section 319 of the federal Clean Water Act and details ADEQ's priorities for addressing NPS pollution, which comes from diffuse sources like water runoff over land and abandoned mines. ADEQ's goal is to protect and enhance Arizona's rivers, lakes, and streams for people, wildlife, and future generations. The intended timeframe for the Plan is July 1, 2025 - June 30, 2030.

On May 12, 2025, ADEQ announced the 30-Day public comment period for the Plan. The public comment period opened on May 12, 2025, and closed on June 11, 2025. ADEQ received seven comment letters during the public comment period.

ADEQ has responded to each comment in this Response to Comments (RTC) Summary.

The following is a list of the public comments received, followed by ADEQ's response in **bold text**.

RAY PFAFF [05/12/2025]

COMMENT #1: Thank you for the announcement. Does ADEQ also have a designated division for the following.

How will or how is AZ monitoring current or future city or town implementation of "toilet to tap" reuse systems of waste water for producing future drinking water in the Phoenix metropolitan area similar to San Diego? Is Gilbert one of the towns/cities?

Also, what type of recycled water will be used by the large computer chip manufacturing facilities in the Phoenix metro areas?

RESPONSE #1: ADEQ appreciates this interest in Arizona's water reuse initiatives. The topics raised regarding "toilet to tap" systems and recycled water for industrial facilities fall under ADEQ's Advanced Water Purification (AWP) Program, which is separate from the Plan. The Commenter was referred to the AWP project manager for follow up. Additional information on the program can be found at: azdeq.gov/awp.

No change has been made to the Plan as a result of this comment.

TIMOTHY LONCARICH, CLIMATE SURVIVAL SOLUTIONS [05/12/2025]

COMMENT #1: The Plan should include testing for PFAS, the most hazardous agricultural chemicals and micro-plastics, and account for the impacts of climate change - which could substantially increase run-off in some cases and in other cases concentrate contaminants in drought-stricken areas.

RESPONSE #1: ADEQ appreciates the importance of testing for emerging contaminants. While it is not part of the Plan, ADEQ is investigating PFAS contamination in the State of Arizona. Information on those efforts can be found at: azdeq.gov/pfas-resources.

No change has been made to the Plan as a result of this comment.

COMMENT #2: The Plan should not be contingent upon outside funding and additional State funding should be allocated. With the current defunding and neutering of the EPA, AZDEQ is going to have to pick up some of the slack.

RESPONSE #2: ADEQ's NPS program is funded from a diverse mix of state and federal funding sources. In recent years, this has included the state's Water Quality Assurance Revolving Fund (WQARF), Water Quality Fee Fund, Clean Water Act (CWA) §319 funds from EPA, U.S. Forest Service (USFS) partnerships, competitive grants through the Arizona Department of Water Resources (ADWR), and other opportunities. ADEQ remains committed to seeking and leveraging multiple funding avenues to ensure the continued success of the program.

Because many of these funding streams are tied to annual budget decisions or competitive processes, long-term stability of state funding requires appropriation by the Arizona Legislature. Within this framework, ADEQ will continue to pursue new opportunities and partnerships to strengthen the program.

No change has been made to the Plan as a result of this comment.

THOMAS WIEWANDT, PhD, WILD HORIZONS [05/21/2025]

COMMENT #1: In planning for a sustainable future, I urge ADEQ to consider shortcomings in our federal laws that are poorly suited to Arizona's desert environments. For starters, the 2023 U.S. Supreme Court decision –Sackett vs. EPA– limits federal protection under the Clean Water Act to wetlands and streams with a year-round surface connection to rivers, lakes, and other navigable waters. Because most of our desert water supplies flow intermittently and often beneath the surface, nonpoint sources of water contamination cannot be scrutinized or regulated by the EPA. So ADEQ must design a comprehensive water management program to protect our water supplies that are connected above and below ground.

RESPONSE #1: ADEQ implements the Clean Water Act, the State Surface Water Protection Program (SWPP), and the Aquifer Protection Program (APP) to protect water quality in the state of Arizona. If a surface water is not federally regulated under the Clean Water Act, it may be regulated under SWPP.

Additional information can be found at:

- azdeq.gov/wotus
- azdeq.gov/SWPP
- azdeq.gov/GWProtection

No change has been made to the Plan as a result of this comment.

COMMENT #2: Be prepared for project review and enforcement challenges. New state and county regulations for protecting our severely limited and dwindling water supplies will be needed. Does ADEQ have a large enough staff for monitoring and enforcement? Do you have a scientifically

trained legal team? It's reassuring to know that Pima County Administrator Jan Leshar has enlisted assistance from U of A's world-renowned hydrologist Dr. Jennifer McIntosh and her grad students. Since 2015, they have been quantifying surface and subsurface water flow and contaminants in/from the Santa Rita Mountains using state-of-the-art precipitation, streamflow, and isotopic analysis. Collaborations of this sort are essential.

RESPONSE #2: ADEQ's surface water quality teams are made up of dedicated scientists and project managers that work together to monitor and assess, permit and enforce, protect and improve Arizona's water quality, and support collaboration with subject matter experts external to the agency. More specifically, and among other efforts, ADEQ:

- **Performs comprehensive monitoring of Arizona's waterbodies and assesses them on a weekly basis in collaboration with the U.S. Geological Survey (USGS), environmental consultants, and ADEQ Arizona Community Science Alliance volunteers.**
- **Developed and utilizes a scientifically rigorous process to determine flow regimes with input from other state and federal agencies and state university scientists.**
- **Partners with universities on research projects, including an Arizona Board of Regents project tasked with building a risk assessment and inventory tool for abandoned mine lands.**
- **Applies novel technologies at complex sites (e.g., application of bio-cementation urease treatment on waste rock piles at Cash Mine in collaboration with Arizona State University).**
- **Collaborates with the Environmental Enforcement Section of the Arizona Attorney General's Office and ADEQ's Office of Administrative Counsel when legal issues arise.**

Through these efforts, ADEQ remains committed to protecting Arizona's water resources and welcomes opportunities for collaboration with external subject matter experts.

No change has been made to the Plan as a result of this comment.

COMMENT #3: Private landowners must be educated and incentivized to conserve water and identify/eliminate sources of pollution. Much of this could be accomplished by strengthening and expanding Active Management Areas in Arizona. Presently, only about 14% of Arizona's land area falls within AMAs, primarily in population centers. Consequently, our state's groundwater supplies remain largely unmonitored and unregulated, giving users an incentive to cheat on unenforced permit agreements, especially when companies are expected to "self-monitor and self-report" their activities. "Groundwater systems" respect no property lines. So problems arising from NPS pollution can be especially difficult to identify, regulate, and eliminate.

RESPONSE #3: ADEQ appreciates the importance of groundwater conservation and landowner participation in protecting Arizona's water resources. While the establishment and oversight of Active Management Areas (AMAs) falls under the Arizona Department of Water Resources (ADWR). ADEQ works closely with ADWR and other partners to ensure water quality protections are in place across the state. Additional information can be found at: azwater.gov/ama/active-management-area-overview

In addition, ADEQ implements the Aquifer Protection Program (APP) which safeguards groundwater quality statewide. This program regulates facilities that discharge directly or

indirectly to groundwater and establishes requirements to prevent, monitor, and reduce contamination. Additional information can be found at: azdeq.gov/GWProtection.

No change has been made to the Plan as a result of this comment.

COMMENT #4:

- Open pit mining operations are a serious and imminent threat to the future of Arizona’s water supplies. As summarized in a 2023 NRDC report, “Forty percent of the headwaters of western watersheds are polluted by mining, ... and ongoing mining is the single largest source of toxic pollution in the U.S.
- Drafted under the pretense of “reforming” the Mining Law of 1872, S.544 - the Mining Regulatory Clarity Act, as written, represents a step backwards, not forwards. It loosens regulations needed to protect our public lands and water supplies. If signed into law, which appears likely under the Trump Administration, this federal legislation would allow large-scale mining companies to dump waste and other mining byproducts in our National Monuments and sites that lie outside the boundaries of original mining claims allowed by the General Mining Law of 1872.
- Mine inspection and enforcement requirements need to be tightened on the state and county levels. Permits, taxes, and fees imposed on mining operations should be scaled to reflect ecological realities based on the scarcity and vulnerability of our water supplies. Eight of Arizona’s ten major copper mines are located in the dry southeastern part of the state - where long-term access to fresh water is already in question.
- Current regulations are weak and overly permissive in Arizona. Because our state has loose mining laws AND loose water laws, industrial giants headquartered in other countries are targeting our nation’s mineral resources. Mining is a water-consumptive enterprise. Provisions in Arizona’s 1980 groundwater code require that agriculture, construction companies, and some industries prove that wells they drill for water won’t affect other wells. But the mining industry is exempt from this requirement. Arizona’s 1980 code needs updating.
- ADEQ’s draft 5-year management plan focuses on the after-the-fact clean-up of legacy/abandoned mining sites. Yes, this is important and might be the only way to secure much-needed federal funds, but meaningful long-term planning must encompass what’s now happening in our water-stressed environment under weak and poorly enforced mining regulations. So I urge ADEQ to implement third-party monitoring and reporting requirements for operative open pit mines. And it would help to impose hefty annual clean-up/restoration fees long BEFORE mines are abandoned. Stiffer regulations are also needed to discourage new and immature mining projects/proposals in areas that should be off-limits for mining, e.g. the Santa Rita Mountains.
- Arizona’s state and county agencies must exercise their independent authority over today’s mining activities, via permits, water rights, and access restrictions. More than any time in history, where, why, and how open pit mines are or are not approved should be evaluated by non-partisan experts collaborating with state and county administrators. Expanding AMAs and ADEQ’s Citizen Science Program would also help to educate and engage voters on these issues.

RESPONSE #4: ADEQ recognizes the importance of strong oversight of mining activities to protect human health and the environment. The focus of this Plan, however, is on abandoned mine lands, sites which lack a responsible party to hold accountable for cleanup

and predate modern regulations protecting human health, environment, and water supply in Arizona.

Active and proposed mining activities conducted in Arizona are required to comply with various federal and state laws and regulations. State laws include, but are not limited to, the following ADEQ programs:

- azdeq.gov/SWPPermitting
- azdeq.gov/GWProtection
- azdeq.gov/air-permits-comp
- azdeq.gov/WPD (various programs)

Additionally, active mines may be required to meet regulatory requirements overseen by other state agencies, such as programs implemented by:

- azwater.gov/
- asmi.az.gov/

No change has been made to the Plan as a result of this comment.

DAN STORMONT [05/31/2025]

COMMENT #1: The plan looks good, but Table 2 is nearly unreadable - the font size needs to be increased.

RESPONSE #1: ADEQ will ensure the final draft of the Plan is formatted for clarity and readability, including increasing the font size in Table 2 and adjusting other formatting as needed.

LI SCHMIDT [06/06/2025]

COMMENT #1: Follow what THOMAS WIEWANDT, PhD, WILD HORIZONS wrote. Thanks for doing this for ourselves and our future generations too.

RESPONSE #1: ADEQ appreciates this comment. Please see ADEQ's responses to THOMAS WIEWANDT, PhD, WILD HORIZONS above.

No change has been made to the Plan as a result of this comment.

NANCY ALLEN, CITY OF PHOENIX [06/09/2025]

COMMENT #1: The 2020 Nonpoint Source Management 5-year Plan for Arizona (2020 NPS Plan) included discussion of the Arizona Waters of the State Program Development (page 4, page 23). In the five years since the 2020 NPS Plan was published, ADEQ has developed and implemented the non-WOTUS protected surface waters (PSW) program. The City suggests that ADEQ include an update on the PSW program in the 2025 NPS Plan and clarify how/if the 2025 NPS Plan applies to non-WOTUS PSWs.

RESPONSE #1: Information and updates on the non-WOTUS protected surface water list under the state Surface Water Protection Program (SWPP) can be found at azdeq.gov/SWPP. Interested parties can also [sign up for email updates](#) on ADEQ communications to stay informed about program developments.

ADEQ supports implementation of NPS projects across a wide range of waterbodies, regardless of federal jurisdictional status. These projects are carried out in collaboration with landowners, stakeholders, and local communities, with landowner permission secured through access agreements. This approach ensures that projects are both feasible and supported locally.

No change has been made to the Plan as a result of this comment.

COMMENT #2: The 2025 NPS Plan includes two metrics that will be used by ADEQ to measure program success and indicates that ADEQ may establish additional assessment metrics (page 9). The City suggests that the timeline or targeted deadline for creating project success metrics be included within this 2025 NPS Plan, such as providing additional clarification in Table 2, Strategic Planning.

RESPONSE #2: ADEQ is required to report pollutant load reductions on CWA § 319 funded projects into the [Grants Reporting and Tracking System \(GRTS\)](#). ADEQ also submits [Success Stories](#) to the EPA for publication. The Plan, as drafted, includes a milestone for establishing other ways of measuring project success at the end of each year of the 5-year period (See Strategic Plan Table, Goal 2, Strategy 4, Milestone 5). These additional success metrics will be captured in the success stories submitted to EPA as ADEQ completes water quality improvement projects. Due to the variability in project completion timelines and project outcomes, ADEQ is unable to add a targeted deadline for this milestone.

No change has been made to the Plan as a result of this comment.

COMMENT #3: For CWA § 319 Project Reporting (page 10), the City suggests that ADEQ consider having the subgrantees and contractors report project established metrics (e.g., timeline or target deadline) in addition to the updates on project budget and process currently provided.

RESPONSE #3: ADEQ agrees that tracking metrics such as timelines and deadlines is important for ensuring accountability and transparency. As part of ADEQ's existing process, subgrantees and contractors already report project metrics monthly or quarterly in ADEQ's existing process. This includes updates on progress toward meeting established project deadlines in addition to updates to the project budget and progress toward achieving project goals.

In response to this comment, ADEQ has added language in Section V. Reporting, Project Reporting, to specify that project reporting includes updates on timelines and deadlines in addition to budgets and progress.

COMMENT #4: Table 2, Goal 1, Strategy 3 discusses expanding public engagement efforts in communities where projects are actively being implemented. The City suggests that ADEQ more clearly state the metrics (e.g., for clean-up events: number of events, attendance numbers, pounds or tons cleaned-up) to the NPS Annual Reports and ADEQ website to summarize successes. This will assist with transparency and public review of the NPS Program. The City also suggests creating a metric for how ADEQ will measure the success for public awareness of NPS, including participation and public practices.

RESPONSE #4: ADEQ appreciates the suggestion. In response to this comment, ADEQ has added language to Table 2, Goal 1, Strategy 3, stating public engagement metrics (e.g., number of events and the pounds/tons clean-up for the fiscal year and per waterbody) will be included/highlighted in each applicable NPS annual report. Such metrics have been

included in NPS annual reports for the 2020-2025 Five Year Plan. Annual reports are available at azdeq.gov/nonpoint-source-pollution-mitigation.

COMMENT #5: The 2020 NPS Plan Strategic Planning Table was more specific in the surface waters and watersheds that were targeted for improvement. However, Table 2, Goal 2, Strategy 1, in the 2025 plan states that ADEQ will balance direct-funded projects with sub-awarded projects but doesn't list any specific projects or watersheds. The City suggests that ADEQ consider revising the Strategic Planning Table to indicate specific surface waters, watersheds or projects. This should include both private and governmental projects, as applicable. In addition, while updates on projects and surface waters are provided in the NPS Annual Reports, the City suggests that ADEQ consider providing updates/successes in this 2025 NPS Plan or include a dynamic dashboard/summary of progress on the ADEQ website.

RESPONSE #5: ADEQ understands the importance of highlighting transparency in project planning and reporting.

In the last several years, ADEQ has shifted to a direct-funding approach when selecting NPS projects. Using this approach, ADEQ embeds itself in priority watersheds or areas for a period of time, investing staff time and programmatic funding in order to produce cumulative waterbody and watershed improvements. In order to stay agile and adaptive over the next five years, ADEQ decided to provide the priority parameters (e.g., metals and *E. coli*) in the Plan rather than specific watersheds or waterbodies.

To ensure transparency and encourage project ideas, ADEQ commits to:

- Listing current projects in priority watersheds at: azdeq.gov/nonpoint-source-pollution-mitigation.
- Providing access to Total Maximum Daily Load (TMDL) reports, which identify sources of NPS pollution for project prioritization at: azdeq.gov/watershed-plans-and-tmdls.

ADEQ also appreciates the idea of developing a dynamic dashboard/summary of progress on the ADEQ website. ADEQ will take this idea into consideration when addressing Goal 1, Strategy 3, Milestone 4, expanding ADEQ's current NPS webpage to be more educational and a resource for the public and partners.

No change has been made to the Plan as a result of this comment.

COMMENT #6: Table 2, Goal 2, Strategy 2 states that ADEQ will continue to implement projects that address top impairment parameters using data from ADEQ's CWA Assessment Dashboard. The City suggests that ADEQ consider providing a project list and/or provide clarity and transparency to the decisionmaking process related to high-priority projects.

RESPONSE #6: ADEQ appreciates this suggestion and will take this idea into consideration when addressing Goal 1, Strategy 3, Milestone 4, expanding ADEQ's current NPS webpage to be more educational and a resource for the public and partners.

As a result of this comment, ADEQ has revised Table 2, Goal 1, Strategy 3 to read, "Include ADEQ's process for prioritizing waterbodies/watersheds and share current priority watersheds and project areas".

COMMENT #7: Table 2, Goal 5, Strategy 1, Milestone 1 states that ADEQ will conduct a review of existing surface water quality data, TMDLs, watershed management plans, etc. to better understand NPS pollution and identify gaps. The City suggests that ADEQ consider publishing a report when this review is completed, both for transparency and to share information on the findings of ADEQ’s review. In addition, the report should be updated as needed per Milestone 2 which states Milestone 1 will be updated each year as additional surface water data is collected.

RESPONSE #7: ADEQ agrees that the information should be shared and transparent. However, the results may take different forms other than a report and ADEQ aims to have flexibility in order to deliver the best outcome. The goal of the Milestone is to better understand the current state of NPS pollution. The Clean Water Act Assessment already provides the analysis of surface water data.

As a result of this comment, ADEQ has revised Table 2, Goal 5, Strategy 1, Milestone 1 to add, “Make any findings or results available online on the existing NPS webpage.”

JENNIFER MARTIN-MCLEOD, SIERRA CLUB - GRAND CANYON CHAPTER [06/11/2025]

COMMENT #1: Emphasize surface water protection in the absence of federal safeguards. In light of the U.S. Supreme Court’s Sackett v. EPA decision and the rollback of Clean Water Act protections for many intermittent and ephemeral streams, it is more important than ever that ADEQ’s NPS program provide a strong and proactive framework for protecting waters that may no longer receive federal oversight. The plan should highlight the importance of strategic state-level monitoring, restoration efforts, and targeted funding to protect vulnerable waterways—both in the most arid regions where ephemeral streams play vital hydrological and ecological roles and in our most intact and thus utterly crucial remaining riparian systems like the Verde and San Pedro Rivers.

RESPONSE #1: ADEQ implements the Clean Water Act, the State Surface Water Protection Program (SWPP), and the Aquifer Protection Program (APP) to protect water quality in the state of Arizona. If a surface water is not federally regulated under the Clean Water Act, it may be regulated under SWPP.

Additional information can be found at:

- [azdeq.gov/wotus](https://www.azdeq.gov/wotus),
- [azdeq.gov/SWPP](https://www.azdeq.gov/SWPP)
- [azdeq.gov/GWProtection](https://www.azdeq.gov/GWProtection)

Additionally, the various funds ADEQ utilizes does not limit the agency to project implementation only on regulated waters. ADEQ’s NPS program is actively implementing projects in headwaters and tributaries to the San Pedro River, Hassaymapa River, and more. As stated in the response to Comment 6, ADEQ commits to sharing project information in priority watersheds at: [azdeq.gov/nonpoint-source-pollution-mitigation](https://www.azdeq.gov/nonpoint-source-pollution-mitigation).

No change has been made to the Plan as a result of this comment.

COMMENT #2: Strengthen and clarify climate change integration. While the plan references climate change in terms of precipitation variability and wildfire risk, we urge ADEQ to further integrate climate resilience into NPS management strategies. Specifically:

- Expand planning for extreme weather events, such as flash floods, prolonged droughts, and post-wildfire erosion. Post-fire runoff is a well-documented nonpoint source of sediment and

nutrient pollution, particularly in fire-prone landscapes like Arizona's forested uplands and desert grasslands. The NPS Plan should acknowledge this risk more explicitly and outline strategies to reduce post-fire erosion impacts, including collaboration with land management agencies on post-fire erosion control and increased monitoring in recently burned areas.

- Prioritize green infrastructure, soil health, and nature-based solutions as tools to increase resilience.
- Consider likely future land use changes and increased urbanization pressures, particularly in rapidly growing areas, and how those shifts could affect nonpoint source pollution.

RESPONSE #2: ADEQ appreciates these suggestions. ADEQ will consider expanding its strategy to include preparing for and responding to water quality issues arising from extreme weather events, such as wildfires. ADEQ has developed the Plan in such a way that it leaves room to expand on its strategy as needed. More specifically:

- **Goal 2, Strategy 2, Milestone 3 provides ADEQ with the ability to designate additional watersheds as high priority in order to address top impairment parameters that may result from extreme weather events.**
- **Goal 3, Strategy 1, Milestone 2 would allow ADEQ to use the predictive model and prioritization structure established as a result of this task to identify watersheds that may be at risk of exceeding water quality standards as a result of extreme weather events.**
- **Goal 3, Strategy 2, Milestone 1 provides ADEQ with the ability to implement protection projects in watersheds currently attaining surface water quality standards, but that may be at risk due to extreme weather events.**

ADEQ has and continues to look for novel, nature-based solutions when implementing NPS projects. Examples of past projects using these kinds of solutions include habitat restoration for beaver reintroduction, low-tech process-based restoration practices like Zuni bowls and rock check dams, and pine resin to stabilize waste piles at abandoned hardrock mines.

No change has been made to the Plan as a result of this comment.

COMMENT #3: Expand public engagement activities and equity considerations. The NPS Plan recognizes the importance of public education and stakeholder involvement. We encourage ADEQ to:

- Deepen outreach to underserved and frontline communities, especially Tribal Nations, rural residents, and those impacted by legacy pollution.
- Provide greater transparency and community access to project selection and evaluation processes.
- Include specific equity benchmarks and tracking mechanisms to ensure that water quality improvements are benefiting Arizonans equitably.

RESPONSE #3: ADEQ appreciates this comment and will take these ideas into consideration as it implements the Plan. Goal 1, Strategy 1, Milestone 4 will deepen the Agency's outreach efforts by increasing collaboration with Tribal Nations, opening lines of communication for information sharing and future partnerships. In addition, ADEQ has committed to expanding engagement efforts in communities where projects are being implemented, most, if not all of which, are in rural areas.

In the last several years, ADEQ has shifted to a direct-funding approach when selecting NPS projects. Using this approach, ADEQ embeds itself in priority watersheds or areas for a period of time, investing staff time and programmatic funding in order to produce cumulative waterbody and watershed improvements. In order to stay agile and adaptive over the next five years, ADEQ has decided to provide the priority parameters (e.g., metals and E.coli) in the Plan rather than specific watersheds or waterbodies.

To ensure transparency and encourage project ideas, ADEQ commits to listing project information in priority watersheds at:

azdeq.gov/nonpoint-source-pollution-mitigation.

ADEQ also appreciates the idea of including specific equity benchmarks and tracking mechanisms to ensure that water quality improvements are benefiting Arizonans equitably. ADEQ will take this idea into consideration when addressing Goal 1, Strategy 3, Milestone 4, expanding ADEQ's current NPS webpage to be more educational and a resource for the public and partners.

No change has been made to the Plan as a result of this comment.

COMMENT #4: Improve monitoring and data transparency. We strongly support continued investment in volunteer-based water quality monitoring through the Arizona Community Science Alliance (formerly Arizona Water Watch). To improve data-driven decision-making:

- Expand support for community science and ensure its integration into regulatory planning.
- Provide timely public access to monitoring data and restoration project outcomes.
- Fill gaps in monitoring on ephemeral streams and headwaters, which are crucial sources of flow and pollutants but are often underrepresented in data collection.

RESPONSE #4: ADEQ is committed to providing data transparency. The current state of monitored waterbodies is available online. All water quality data, including data collected by community scientists, is publicly available via EPA's [Water Quality Exchange](#). Recently, ADEQ expanded the Arizona Water Watch program into a community science program for air, water, and waste, now called the [Arizona Community Science Alliance](#). With current funding and resources, ADEQ strives to fill gaps in monitoring through strategic statewide monitoring conducted by staff, consultants, USGS, and community scientist volunteers. If you are interested in joining the sampling effort, you can become an [Arizona Water Watch volunteer](#).

No change has been made to the Plan as a result of this comment.

COMMENT #5: Prioritize watershed health through holistic management. We commend the plan's watershed-based approach. To further this, we recommend:

- Greater integration of upland land management practices (e.g., grazing, recreation, mining, road-building) into watershed protection efforts and advocacy for watershed health where conflicts exist.
- More collaboration with land management agencies to reduce erosion and runoff at the source.
- Consideration of cumulative watershed impacts, particularly in areas with multiple land uses and overlapping sources of pollution.

RESPONSE #5: ADEQ appreciates this comment and will take these ideas into consideration as it implements the Plan. ADEQ takes a watershed approach when addressing NPS pollution. By directly funding projects within watersheds, ADEQ can focus on priority areas for a number of years, building relationships within the community, maximizing its positive impact on the watershed and individual waterbodies.

No change has been made to the Plan as a result of this comment.

COMMENT #6: Transparent and accessible project selection and outcomes. While the Plan outlines the 319 grant program process, additional clarity is needed on:

- How projects are prioritized, including criteria related to ecological needs, pollution load reduction potential, and environmental justice.
- How success is measured and whether ADEQ will publish clear, long-term outcomes beyond short-term milestones.
- How ADEQ will adapt and continue its mission when EPA support and funding may be jeopardized.

RESPONSE #6: ADEQ will take these ideas into consideration when addressing Goal 1, Strategy 3, Milestone 4, expanding ADEQ's current NPS webpage to be more educational and a resource for the public and partners.

Goal 4 aims to identify and increase external grant funding opportunities. Currently, the ADEQ NPS program is funded from various state and federal funds, and in the last several years has included funding from the state's Water Quality Assurance Revolving Fund (WQARF), Water Quality Fee Fund, Clean Water Act (CWA) §319 funds from EPA, U.S. Forest Service (USFS) partnerships, competitive Arizona Department of Water Resources (ADWR) grant funds, and more. ADEQ will continue to seek opportunities for additional funding. It should be noted that state funding requires the Arizona legislature to appropriate funds each fiscal year.

No change has been made to the Plan as a result of this comment.