



- Strike long turn around and review times
- Change lack of access to limited

### Ideal State

- Approval process should be based on the history of the Corps process; need to have opportunity to have the applicant
  - Current data shows an average of 145 days
  - Possibly consider a period for review complete application and then a number of days for review
  - Include a pre-application meeting option
- Significant Nexus Analysis needs to be defined as nexus to the TNW and a clear checklist of information needed
- Can ADEQ accept a letter for areas already under an AJD or known to be not jurisdictional (comply with a checklist) without going through the full AJD process
- Strike the second and third bullet
- Add a bullet for the AJD and PJD should be at no charge
  - It is unrealistic for permittees to cover all program costs without state general funds
- These submittals will be from a wide range of size and type of projects; can there be an easy/short option for small, less complex projects (a preliminary screening to lessen the field work)
  - PJD has a desktop option if current aerials available
- Add: ADEQ have commensurate level of staff expertise

### Gaps

- Strike the fifth and sixth bullet
- What are the unforeseen consequences

### Closure Options

Brian to update the list based on previous discussions

### **Future Discussion Needed: (This is a cumulative list. Items will remain until discussed.)**

- (9/12) Does the EPA have the authority to veto Jurisdictional Determinations?
- (9/12) Does the Army Corps have a definition of ephemeral?
- (10/10) Three options for WOTUS
- (10/24) PJD may be able to determine nothing is jurisdiction (no ordinary high-water mark)
- (10/24) Significant Nexus Analysis – need to have separate conversation on the topic
- (10/24) State specific forms and guidance and methods to make the process more objective (AJD and PJD)
- (10/24) Licensing Time Frames recommendations to be discussed (can JD be submitted concurrently with a permit application)
- (10/24) Should there be a fee for AJD/PJD – free or reasonable fee
- (10/24) Is it possible to have a preliminary screening or letter if already a known JD
- (10/24) Which comes first connectivity or OHWA?
- (10/24) Identification of TNWs in Arizona (will Corps be providing the list)
- (10/24) Does the group need a time extension

**Action Items:**

- Number bullets on handouts for easier reference
- (10/24) Identification of TNWs in Arizona (will Corps be providing the list)
- Brian to update the closure list based on the gaps discussion
- Jill update the wetland list based the AJD and PJD discussions

**Next Meeting**

- Next meeting: November 7, 1-3 p.m. at ADEQ, rm. 6100B
- Agenda
  - Significant Nexus Analysis – need to have separate conversation on the topic
  - How does Corps do the analysis and challenges (Jill to begin the outline)