ADEQ Water Quality Division

2018 Triennial Review Stakeholder Issues Matrix

As of 5/29/2018

Source										Topic	Comment
Mtg:	Mtg:	Mtg:	Ses. 1:	Ses. 2:	Ses. 3:						
4/30/18		5/7/18	5/10/18	5/10/18	5/10/18	Email	Letter	Phone	Other		
						х				WOTUS, WOT State	1. The definition of WOTUS vs. Waters of the State. How will Arizona define, delineate and promulgate/enforce laws regarding these definitions? Will ADEQ provide a map that delineates and clearly defines these waters, their associated designations and water quality standards?
						х				Definition: surface water	I may suggest revising the definition of "surface water" in the rules to just mirror that of "navigable water" in A.R.S. 49-201(22), given that the current standards are intended to apply to CWA navigable waters only. We touched on this topic in the Appendix B workgroup, but it was outside the scope of the charter and we decided not to address it in the final consensus documents, acknowledging that comments on the definition could be raised in the broader triennial review process (this is referenced in Final Consensus Deliverable – Topic 1 from the Appendix B workgroup, dated 3/2/18).
						х				Delisting "urban lakes"	Could ADEQ talk about how Cities can go about requesting to delist Urban Lakes? It may be that ADEQ isn't doing that in-depth of a review right now but I'm specifically referring to the below two but there may be more. Many urban lakes have no direct tie to a Waters of the US, like the Salt River.
						Х				WOTUS, WOT State	Rule development for waters of the state; waters of the state vs. waters of the U.S.
						х				Definition: stakeholder	I would appreciate receiving more information on the definition of "stakeholders" as used in your description of the status of the Triennial Review Rulemaking, as well as on the membership composition and selection process for the three workgroups.
						х				Meeting or other logistics	I have received your invitation for the upcoming meetings and I thank you for the notice. I would definitely like to participate in all three meetings as would many of my neighbors and friends. The major hurdle we face is that the meetings are on three different days and they are all being held in Phoenix. This makes the likelihood of any of us interested parties being able to attend, regardless of the importance of our input and participation, very unlikely because of the 2 1/2 hour drive to and from the three meetings, as well as the huge expense of two nights in hotel rooms for each of us to save the long commute. We would like to request that you schedule public meetings in Tucson so that the interested citizens of Southern Arizona are able to share in this very critical process to preserve our scarce water. I understand that the conference call/webinar option is being made available to those unable to attend but past experience with these meetings proves to me that this option does not provide the best opportunity for our
						х				Meeting or other logistics	Darticipation. One specific request is that since this process affects surface waters in southern Arizona, there should be a parallel in-person briefing process in Tucson; conference calls and webinars are not efficient.

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4/30/18	5/1/18	5/7/18	5/10/18	5/10/18	5/10/18	Email	Letter	Phone	Other		Maria de la companya
х										Meeting or other	Will there be public meetings? Meetings should occur in the evening when the public
										logistics	can attend.
х										Meeting or other	Will the slides be available?
										logistics	I think the numbers related to fish consumption will need to be explained to the public
х										Appendix B	so that they don't think that something is being taken away from them
								<u> </u>			In Section C there is a discussion of how to determine violations, but unpermitted
х										Enforcement	sources often rely on TMDL.
							-				What if a water company dumps sludge in water, are we saying this would not be
х										Enforcement	throwing away use of narrative standards?
								-		Enforcement	So if there was a permitted discharger, would this apply?
X								-		Enforcement	It would be helpful to know about how the enforcement rule was applied in the past.
Х										Enlorcement	In the 1995 sludge case, the unlawful discharger tried to get a permit from ADEQ,
v										Enforcement	which was denied. Limiting this to non-permitted discharges makes sense. This rule
Х										Enlorcement	has backed up a lot of cases, but not as civil enforcement cases.
								 			In enforcement situations, ADEQ has alleged cases of water quality violations. We
х										Enforcement	have seen cases where this is settled in a civil situation.
х							-			Enforcement	Can you clarify how Section C language was developed?
^								l 		Emorocinicht	Is the contractor looking at whether the application of mixing zones in other ways will
Х										Mixing Zones	affect the permit holders?
х										Mixing Zones	Will ADEQ look at whether mixing zones are appropriate?
_^										Meeting or other	Transitation at mounts mixing conce are appropriate.
Х										logistics	When the contractor document is complete, will it be posted?
										1.09.01.00	On the Appendix C disapprovals, is there anything EPA provided that could be useful
Х										Site-Specific Standards	to explain pitfalls to avoid?
х										Variances	Must a variance be issued as a water quality standard?
Х										Variances	Are the established variances going to be put into this rulemaking session?
Х										Variances	What if we need technology change?
											Rule should meet the requirements of the CWA regarding fishable, swimmable
Х										Values	waters.
Х										Values	Rule should be compliant with 2015 EPA changes.
Х										Rule-making process	What resources does ADEQ need to fully implement the rule?
.,											Will ADEQ respond to nomination of Upper Verde? It is insulting that they have had
Х										Rule-making process	to wait.
											What should be changed for future meetings: Meeting was listed as WebEx;
, , l										Meeting or other	however, unable to view or hear presentation during designated meeting time.
Х										logistics	Attempted several times to join by WebEx and dial in: dial in number 602-771-4777
											had a busy tone; WebEx host Richard Gay was not presenting. (Evaluation.)
	v									Numeric Standards:	
	Х						<u> </u>			Ammonia	Do the places Unionids used to exist that overlap with any other areas?
	~									Numeric Standards:	
	Х									Ammonia	ADEQ will need to negotiate whether Unionids are present in effluent waters.
	~									Numeric Standards:	
	Х									Selenium	How is this going to change the standards in the appendix?
	Х									Numeric Standards:	Are you planning to use 3.1 micrograms per liter?
	^									Selenium	Prior you planning to use s. i introograms per liter:

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Mtg:	Mtg:	Mtg:	Ses. 1:		Ses. 3:	E	Letter	Diverse	Other		
4/30/18	5/1/18	5/7/18	5/10/18	5/10/18	5/10/18	Email	Letter	Phone	l	Numeric Standards: Selenium	We (Fish and Wildlife Services) are actually comfortable with this standard and the listed species that will be considered. The EPA concentration was at approximately 6.
	х									Numeric Standards: Selenium	If the water concentration is over 3.1 micrograms per liter will ADEQ do fish tissue sample?
	х									Numeric Standards: Selenium	Why is dry weight used for fish tissue?
	х									Numeric Standards: Selenium	We (Fish and Wildlife Service) mainly see bioaccumulation of selenium on the Colorado River.
	x									Numeric Standards: Cadmium	What hardness level is used here?
	х									Numeric Standards:	Suspended sediment concentration used to be a turbidity standard. What is ADEQ's
	х									Other Meeting or other logistics	position on this and is this the right number for the suspended sediment? When can we get the list (changes to numeric standards)? Will it show strikeout language changes
	Х									Nutrients	We used to have tables showing ranges of hardness from 1-400. Will this be available?
	х									Nutrients	How will judgements appear in a discharge to ephemeral water that would not affect a perennial water.
	х									Nutrients	I am concerned that this is a very qualitative process, not subject to clear-cut standards.
	Х									Toxicity Testing	Will background values be taken into consideration?
	х									Meeting or other logistics	What should be changed for future meetings: More details on OAW, EDW and Antideg should be provided next Monday. (Evaluation.)
		Х								OAW: other	What is Tier 3?
		x									Who can nominate a water body?
		Х								OAW: sampling	OAW sampling requirements are significant and cost a good deal of money.
		х								OAW: "good quality"	I prefer the recommendation for striking the requirement for good water quality for the very reason that requiring the water to be of "good quality" specifically incentivizes the pollution of said water bodies to escape protection.
		Х								OAW: "good quality"	What is currently the requirement for "good quality?"
		x								OAW: sampling	As a storm water manager we have to sample for a number of parameters. I would be interested in making that change because sampling "multiple locations over all seasons" results in requiring \$12,000 of sampling. I would prefer monsoon and winter rain sampling periods to save money. I also recommend the use of "key locations," because I wouldn't want the cost of sampling to limit nominations for an OAW.
		Х								OAW: sampling	Agree with this comment. The financial commitment would be an onerous burden for making a nomination. Nomination is a lot of work.
		х								OAW: "good quality"	To me, this reads as if an OAW is deemed as a crucial spawning location it would not be eligible to be designated OAW due to the requirement to meet "good water quality standards."
		х								OAW: "good quality"	The existing rule requires that available water quality data be brought forward. Once the protection is in place, ADEQ develops an information base.
		х								OAW: other	There are already MS4 and MS5 rules. Shouldn't these be consistent? Seems these rules would compete with others.

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4/30/18	5/1/18	5/7/18	5/10/18	5/10/18	5/10/18	Email	Letter	Phone	Other	OAW: "good quality"	If you list a water without a lot information on water quality, how would you do that without baseline information?
		х								OAW: "good quality"	The "good water quality" language was put in by ADEQ for a good reason. Many waters were requested to be placed on the OAW list. There should be criteria to list a water at ADEQ's discretion, and not use this designation as a zoning tool.
		Х								OAW: "good quality"	In Arizona, water is a limiting resource and affects the economy. Any water body should be considered regardless of "good water quality."
		Х								OAW: "good quality"	If the "good water quality" designation was removed, would there be baseline information to understand if water degraded?
		х								OAW: tier 3 maintained	If ADEQ is responsible for establishing the baseline, consistent standards should be established for doing so. Once a water is on the list, it would be difficult to have that water removed, so it's important to establish this properly.
		Х								OAW: sampling	If ADEQ is responsible for establishing the baseline, I am concerned this would be one more reason for the department not to do so, in part due to the expense.
		х								OAW: sampling	As mentioned before, there are concerns over the costs for nominees to nominate water bodies. Therefore, I believe the requirement for the nominees to provide data could be prohibitive. I also support the idea that degradation should trigger additional monitoring by ADEQ, as well as sharing of best management practices.
		х								Rule-making process	What happens with the non-consensus recommendations when they are conflicting such as in this case?
		х								OAW: sampling	I mirror the concern that requiring the nominee to provide excessive amounts of data may take some water bodies out of the running when they desperately need protection.
		Х								OAW: sampling	I agree with the last statement. It's better that the state do the initial work.
		Х								Rule-making process	Looking at the matrix provided, I am concerned that many voices said that restoration would be important and this is not reflected on paper.
		Х								OAW: water quality degrading or impaired	There is a difference between degradation and impairment. The cause is really what we should consider. This is not an easy answer.
		Х								OAW: water quality degrading or impaired	The only reason an OAW should be declassified is if the reason for doing so no longer exists.
		Х								OAW: water quality degrading or impaired	It might be helpful to include an explanation about taking an OAW off the list.
		Х								OAW: water quality degrading or impaired	I feel degradation should prioritize monitoring, and should definitely not warrant declassification.
		Х								OAW: water quality degrading or impaired	I would also think that degradation should trigger a plan to not only monitor but improve water quality.
		х								OAW: other	When nominating an OAW, can an area be considered for protection that has high historic value that has been recorded, for example for sustaining an endangered species? For example, a water may have some recent water quality threats but it may still have outstanding value.
		Х								OAW: water quality degrading or impaired	I agree that the point of the CWA was to restore waters that had been impacted.
		Х								OAW: water quality degrading or impaired	There needs to be a way to get something off the list if it needs to be removed. I don't think an additional layer is needed.
		х								OAW: water quality degrading or impaired	We may need to clarify why waters are listed in order to understand why they should be delisted.

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4/30/18	5/1/18	5/7/18 ×	5/10/18	5/10/18	5/10/18	Email	Letter	Phone	Other	OAW: water quality degrading or impaired	I don't think it is correct to speak in terms of "declassifying" an OAW. It should be considered a revision to a water quality standard. Other requirements related to a water would still apply.
		х								OAW: water quality degrading or impaired	Declassifying means the director would have the authority to unilaterally remove an OAW from the list. This is in contrast to the process where the water is added to list.
		х								OAW: water quality degrading or impaired	I don't believe declassifying is allowed under the CWA. This should be thought of as CWA standard.
		Х									I didn't read that declassification is at the director's discretion. I believe it needs to go through the full rule-making process.
		Х								OAW: water quality degrading or impaired	We may want to use different wording, such as a de-listing, which reflects the rule-making process.
		Х								OAW: flow-regime	Are the definitions the same as those used in stormwater rules?
		Х								OAW: flow-regime	I support intermittent waters as well.
		x								OAW: flow-regime OAW: flow-regime	We have to expand what we view as significant in order to protect our waters. I echo last comment. In Arizona, ephemeral waters are unique to the southwest and they should be included as potential waters for protection.
		х								OAW: flow-regime	I agree with: ephemeral waters are unique to the southwest and they should be included as potential waters for protection.
		х								OAW: flow-regime	There are many wildlife species that are adapted to temporary water sources. It doesn't make sense to exclude ephemeral waters from OAW.
		Х								OAW: flow-regime	I am concerned about monsoon rains, which are essentially storm waters, to be fighting with OAW requirements. Storm water has different CWA requirements.
		x								OAW: flow-regime	Many free flowing waters in Arizona are ephemeral. I appreciate the dilemma. If Arizona water is critical for some ecosystem, I hope we find a way to accommodate these issues. Some ephemeral waters are in areas where there used to be free flowing waters.
		Х								OAW: flow-regime	Do we need to overlay these standards over others for ephemeral waters? I wonder if we have gone astray from the intent.
		Х								OAW: flow-regime	Ephemeral and other waters are already protected through other standards, do we need to also consider them outstanding?
		Х								OAW: flow-regime	I support removing flow regime requirements.
		х								OAW: flow-regime	I agree about the biological value of seasonal and intermittent waters in the desert. This doesn't have to mean sampling of high flow storm water events. Some important waters flow for several months and have seasonal base flow.
		Х								OAW: water quality degrading or impaired	What is the legal basis for declassifying?
		Х								OAW: flow-regime	We have interrupted streams in Arizona. This is why the flow regime is complicated and differs from year to year.
		х								Rule-making process	ADEQ told us that it is not going to consider the nomination of the Upper Verde or any other waters during this rulemaking process. We were previously told this would be the time to do so.
		х								Antidegradation: temporary impacts	I understand that you want to identify other instances outside the 404 process. I am still grappling with what circumstance you are attempting to address.

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4/30/18	5/1/18	5/7/18	5/10/18	5/10/18	5/10/18	Email	Letter	Phone	Other		
		x								Antidegradation: temporary impacts	Pima County disagrees with this proposed change to remove the "temporary impacts" language from subsection 4 and to create an independent subsection with the "temporary impacts" language. The proposed change broadens the allowance of temporary impacts to Tier 3 protected OAWs so that it would include discharges beyond those regulated under §404 which require §401 approval. During our workgroup discussions, ADEQ failed to identify the need for this broadening for temporary impacts and could not describe the types of activities that were intended to be covered in this manner. For this reason, it is not possible to offer any alternative rule language to accommodate ADEQ's intent. Therefore, we believe that the rule language should remain as is.
		Х								EDW	A discharge of EDW into an ephemeral water is included in the permit.
		Х								EDW: definition of	Attendees agreed that it is preferable to define wastewater, rather than a definition by
		^								wastewater	exclusion.
		х								Rule-making process	The overarching benefit should be considered. The criterion should be whether any changes under consideration would impede Arizona standards.
		Х								Rule-making process	Rules should be clear, without ambiguity.
		x								Rule-making process	I appreciate the process. We need to make sure other rules don't conflict with the rules being considered. We also need to recognize that if a standard is not covered under this rule, there are many others. We don't want to over-layer the use of rules if they occur elsewhere.
		x								OAW: flow-regime	One of the uses of ephemeral waters is as a recharge to the aquifer, however this is not reflected in the standards. I would like to see more protection for the value that ephemeral streams provide.
		х								OAW: flow-regime	I agree (regarding ephemeral waters as a recharge to the aquifer) and would like to get the storage credits as well. However, all discharges have to be permitted.
		х								OAW: flow-regime	I believe the surface water standard versus the drinking water standard is the heart of the question.
		х								OAW: flow-regime	We should not confuse these standards, although there is some overlap. The goal is to protect the ephemeral reaches.
		х								WOTUS, WOT State	One of the motivations for a triennial review is to look at the waters of the state. What is the current thinking for Waters of the State that are not Waters of the U.S.
		Х								Other: AZPDES	How to AZPDES permits get issued?
		х								Other: water quantity	Has ADEQ invested in a risk assessment on how climate change would affect surface water? This is in reference to how dwindling water resources might affect surface water.
		х								Other: surface water	It seems that to properly assess and protect SWQ standards, there is a resource at ADEQ for this. Will you be talking about this during the rule-making process. Seems like there are lots of needs beyond permits.
		Х								Other: FYI	Arizona Water Watch is a volunteer monitoring program that takes advantage of citizen scientists to provide waterbody photos and data.
		х								Meeting or other logistics	Will the information be on the ADEQ website?

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		х								OAW	The 2018 TR proposed topics and their justifications for public meetings. References lack of clarity regarding whether an OAW should be removed from the list if it becomes impaired. I was a participant in the OAW meetings and while one participant did raise removal of an OAW if it becomes impaired, several participants volunteered(?) that it would be more in keeping with the intent of OAW designation for an OAW that becomes impaired to be restored, no removed. (Comment card.)
		х								OAW	Ephemeral waters should not be eligible for OAW listing under RL8-11-112. Why? Because the 3 Anti-Degradation standards apply to OAW's by operation of law who RL8-11-107 D. The 3 states that all degradation is prohibited – that is a zero-degradation standard. 107 D, 107.0 (C). (Comment card.)
										Meeting or other	What should be changed for future meetings: There needs to be evening and/or
		Х								logistics	weekend meetings so general public can participate. (Evaluation.)
			х							Meeting or other logistics	Do you intend to have one public hearing in Phoenix?
			Х							Definition: stakeholder	Who is a stakeholder?
			x							Appendix B	The recommendation ("impaired" waters do not need to be listed in Appendix B unless there is a designated use besides those provided by tributary rule) appears to not track any further by not including it in Appendix B.
			х							Appendix B: tributary rule	Do the agricultural practices cited have to do with water coming off agricultural practices or water coming in?
			х							Appendix B: tributary rule	In Cochise County there are a lot of washes that connect to the San Pedro. They aren't necessarily JDs. Where do they fall?
			Х							WOTUS, WOT State	Which definition of WOTUS do you use?
			Х							Mixing Zones	Aquatic standards incorporate the cool and warm water species, could this concept be incorporated here?
			х							Mixing Zones	Some stakeholders have said that they were having trouble meeting the standards at the end of water.
			Х							Variances	What is the public process for issuing a variance?
			Х							Other: surface water	How does ADEQ deal with polluted ground water that becomes surface water?
			Х							Values	Clean water
			Х							Values	Minimal pollutants
			Х							Values	Guaranteed clean water for future generations
			Х							Values	Standardized rules and more consistency
			х							Values	Continue to recognize ephemeral and intermittent waters, regardless of changes to WOTUS
			Х							Values	Intermittent waters need to continue to be recognized and protected
			Х							Values	Maintaining and improving riparian areas
			x							Values	Value of clean water – Whatever activity that might degrade the quality of the water should be the same activity that is responsible for returning it to the same standard.
			х							Definition: surface water	Arizona surface waters definition should include all Arizona waters including intermittent and ephemeral waters. (Comment card,)
_			х							Other	Given past budget cuts, and talk about allowing more flexibility and site specific standards, and new programs, ADEQ needs more capacity and quality assurance. (Comment card,)

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				х						Appendix A: data	2013 and 2016 EPA data is shown. Can the state react more quickly to update the
											standards?
				х						Appendix A: standards	Does ADEQ think about the impact of climate change on mountain streams and the temperature of bodies of water.
							-			Appendix A	Could an individual stream above 5,000 feet be a warm water location?
				X						Rule-making process	When does the EPA insert themselves in the process?
				^						Meeting or other	When does the EFA insert themselves in the process:
				Х						logistics	Do comments heard today need to be written up and sent in?
				Х						Nutrients	What was the purpose behind these standards?
				X						Nutrients: listed water	Why would a small creek be named/listed?
				X						Nutrients	Does ADEQ have funding to do the testing?
				X						Nutrients	I am interested in the stream characteristics in the proposed language.
											If there are no numeric criteria for nutrients, how will you calculate a downstream
				Х						Nutrients	effect?
				Х						Values	Clean water
				Х						Values	People over profit
											Whoever uses the water should return water at least as good of a condition as prior to
				Х						Values	its use
				.,						Values	EPA makes changes to numerical levels at the federal level. We need to figure out
				Х						Values	what is clean for Arizona.
				v						Other: mining	I think that the Rosemont mine poses a threat to water. HudBay really wants a mine
				Х						Other. mining	there and has proposed start dates.
				х						Rule-making process	It seems wrong that if EPA does not agree with an Arizona-proposed change they can
				^						Nule-making process	choose not to accept it.
				Х						Other: mining	What is the status of the mine in Florence?
				х						Definitions	I have questions about the definitions in R18-11-101. In CWA, 11, many references
				^						Deminions	include "as amended."
				х						EDW	In R18-11-101 (17), effluent dependent water, why is this restricted to ephemeral
											waters, not intermittent?
				Х						OAW: flow-regime	What about the stretch of the San Pedro that has changed in flow?
				Х						OAW: flow-regime	Who defines flow regime?
				Х						Other: water quality	What about the issue of water quality along the Arizona/Mexico border?
				Х							I heard that the lithium content is higher in Bisbee than the rest of Arizona.
					х					Meeting or other	Concern that OAW discussion would be cut off at 4 p.m.
										logistics	i i
					X					Rule-making process	Is there a written comment period?
					X					Other: water quantity Definition: stakeholder	Do any of these standards address the availability of water? I was told I was not a stakeholder.
					Х		 	-		Denninon, Stakenoider	Are these rules intended to take over the rules and jobs of the federal government?
					х					Other	Will it get rid of the CWA in Arizona?
\vdash					Х		-			Other	Is there a new department being established?
\vdash					X		-			OAW: flow-regime	How does ADEQ break up reaches?
\vdash					X		 			OAW: now-regime	Why would ADEQ consider changing the classification of a water at this time?
					_^						There is a reach on Davidson Creek part of Appendix B that is an ephemeral reach.
					х					Appendix B	There is an exclusion in the rule for ephemeral waters and impaired waters.
					х					OAW: other	Are you considering taking the water off the list?
 					X					OAW: other	What is the process for nominating a water for OAW?

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4/30/18	5/1/18	5/7/18	5/10/18	5/10/18	5/10/18	Email	Letter	Phone	Other	OANA flour regime	What is the difference between only amount and intermittent?
					Х		-			OAW: flow-regime OAW: water quality	What is the difference between ephemeral and intermittent?
					х					degrading or impaired	What criteria used to designate an impaired water?
											How much does climate change play into all of this? When does water get impaired
					Х					Other: water quality	from climate change?
					Х					Rule-making process	When was the last triennial review?
					Х					Other	What percent of your budget is through permit fees?
					Х						How does the volume of comments affect the process?
					x					OAW: water quality	Sounds like OAWs are waters we care about, but if they degrade they could be
										degrading or impaired	delisted. This sounds like the opposite of what we should do.
					х					Other: mining	This process is very technical. I think we all care that HudBay wants decreased protection.
					x					OAW: water quality	I think we want everything protecting the water to be retained. If a water is dirty, clean
					^					degrading or impaired	it up.
					х					OAW: water quality degrading or impaired	I support idea that an impaired water should be fixed, not taken off the list.
					х					Rule-making process	Does ADEQ have the power to put ephemeral or climate change concerns into the rule.
					Х					Rule-making process	Under the new rules could a waterway be delisted?
					.,					OAW: water quality	The matrix shown again you don't have the resources to do the esigned
					Х					degrading or impaired	The matrix shown says you don't have the resources to do the science.
					х					Other: water quality	How do you address TENORM (Technologically Enhanced Naturally Occurring Radioactive Materials) in Arizona?
					Х					Other: water quality	How do you protect the water?
					х					Meeting or other logistics	I am concerned that business interests will be considered over those of the public.
					х					OAW: flow-regime	Ephemeral flows can represent the same water present underground. This process should recognize the connection with the water three inches underground.
					х					OAW: definition	Include in the OAW definition, "any water system that feeds into a city's watershed."
					Х					Antidegradation	How long does it take to establish reliable baseline data?
					х					Antidegradation	I think this is a critical element and should not be allowed to temporarily degrade the water for any period of time.
					х					Other: mining	I heard that Rosemont could pump all the water they want out of Cienega because it is outside the AMA.
					Х					Other: water quality	There are 22 OAWs in state. Are the rest of the waters protected in any way?
					Х					Rule-making process	Why has a rulemaking been initiated
					х					Other: mining	I heard that Rosemont has a deal with Green Valley Water Company, which is interesting regarding the drought.
					х					Other	What impact would ADEQ's ability to issue 404 permits have on this process?
					x					Other: water quantity	We are close to extreme drought in Arizona. Are your decisions independent of this?
					х					Rule-making process	I am concerned about possibility of losing the opportunity to have a public process.
					х					OAW	Concerns about protecting the water way and OAW stream that are downstream of the Rosemont area from a potential discharge.

Source										Topic	Comment
Mtg:	Mtg:	Mtg:	Ses. 1:	Ses. 2:	Ses. 3:						
4/30/18	5/1/18	5/7/18	5/10/18	5/10/18	5/10/18	Email	Letter	Phone	Other		
					х					APP	How does an aquifer protection permit and the contaminants affect surface waters?
					Х					OAW	OAW standards are vulnerable to this interaction. Is this addressed in any way?
					х					Rule-making process	There was a proposal at the Legislature to redefine effluent. How might this get connected to these proposals?
					х					Rule-making process	I want to note there is a federal register notice on the applicability of CWA on daylighting. They are taking comments at this time, and information can be found via the internet.
					х					WOTUS, WOT State	Rule in Section R18-11-120 – Will need this for waters of the state? Why get rid of this tool, given that you could use this for a waters of the state program? (Comment card.)
					х					Antidegradation	Antideg: ADEQ should use EPA flow modification guidelines to evaluate permit activities that reduce flows. These were done in 2015, 2016. (Comment card.)
					х					OAW	OAW – Removing ephemeral reaches of OAWs does not make sense. (Comment card.)
					х					OAW: water quality degrading or impaired	OAW – Confusion was caused adding "impaired water" standard to OAW. (Comment card.)
					х					OAW	I think you should add "ephemeral" streamflow realities into the new rules. I think you should add climate change models and probabilities into the new rules. (Comment card.)
					х					OAW	Small ephemeral reaches of a much larger stream channel should be included in OAW. Consider overall "character" of a stream (perennial, intermittent, ephemeral) for a particular reach, not small sections within. (Comment card.)
					х					OAW	OAW retainment should be based on ecological significance and suitability of use for T&E, species of concern, and other special designation species. Important to keep protection of species and water afforded by OAW status. (Comment card.)
					х					Other: mining and water quality	Letter from Mary Jo Sheldon-DiVito (attached separately).
					Х					Rule-making process	Resolution of the Pima County Board of Supervisors (attached separately).
					х					Meeting or other logistics	Best thing about meeting: Audience response. (Evaluation.)
					х					Meeting or other logistics	Best thing about meeting: Audience responses.(Evaluation.)
					х					Meeting or other logistics	Best thing about meeting: Leaned about the process. (Evaluation.)
					х					Meeting or other logistics	Best thing about meeting: Questions and answers.(Evaluation.)
					х					Meeting or other logistics	Best thing about meeting: Seeing the report for water quality protection from attendees.(Evaluation.)
					х					Meeting or other logistics	Best thing about meeting: The meeting was well run and the facilitator did a good job keeping us on track + focus on the topic. Thank you for making this opportunity available. (Evaluation.)
					х					Meeting or other logistics	Best thing about meeting: You attempted to listen to as many people as possible.(Evaluation.)
					х					Meeting or other logistics	What should be changed for future meetings: ALL comments provided in advance, clearly accessible.(Evaluation.)

Source										Topic	Comment
Mtg:	Mtg:	Mtg:	Ses. 1:								
4/30/18	5/1/18	5/7/18	5/10/18	5/10/18	5/10/18	Email	Letter	Phone	Other		
					x					Meeting or other	What should be changed for future meetings: Larger venue, maybe more
					^					logistics	time.(Evaluation.)
					v					Meeting or other	What should be changed for future meetings: Less time on concerns of ADEQ.
					Х					logistics	(Evaluation.)
					v					Meeting or other	What should be changed for future meetings: More time for attendees to inform
					Х					logistics	ADEQ of their concerns. (Evaluation.)
					v					Meeting or other	What should be changed for future meetings: More time for emotional, non-wonky
					Х					logistics	issues. (Evaluation.)
					.,					Meeting or other	What should be changed for future meetings: Post schedule of process on line, rather
					Х					logistics	than on slides/text. (Evaluation.)
										Mosting or other	What should be changed for future meetings: Your process, actions and dates, have
					х					Meeting or other	been unclear. Today is the first I heard you are employing a new process, which is a
										logistics	good process, to write new regulations. (Evaluation.)