**Section 9: Summary of EPA’s 9 Key Elements for Section 319 Funding**

**Introduction**

All projects that apply for Section 319 funding under the Clean Water Act and administered through the Arizona Department of Environmental Quality must include nine key elements in their watershed-based plans. These elements are listed in Section 1 of this Watershed-Based Management Plan and are also discussed in the Nonpoint Source Guidance Document by the US EPA (http://www.epa.gov/owow/nps/319/index.html).

The nine key elements are described below and the corresponding sections of this NEMO Watershed-Based Management Plan are noted. Information and data to support this requirement can be found in these sections of this Plan.

**Element 1: Causes and Sources.** 
NEMO Sections 6 and 7

The watershed-based plan must identify the sources that will need to be controlled to achieve load reductions established in the nonpoint source TMDL.

In addition, pollutants of concern must be identified, and the causes and sources (primary and secondary) of waterbody impairment (physical, chemical, and biological, both point and non-point sources) must be linked to each pollutant of concern.

Section 6 of the NEMO Watershed-based management plan prioritizes the subwatersheds for risk of impairment due to metals, sediment, organics and selenium nonpoint source pollution. In addition, the potential causes for each constituent are described so that the watershed group can begin identifying the source of the risk.

Section 7 of the NEMO plan discusses existing TMDLs in the watershed that identify known sources of waterbody impairment.

**Element 2: Expected Load Reductions.** 
Not included in NEMO Plan

The plan must contain an overview of TMDL load reductions expected for each Best Management Practice, linked to an identifiable source (only required for sediment (tons/yr), nitrogen or phosphorus (lbs/yr)).

**Element 3: Management Measures.** 
NEMO Sections 7 and 8

The plan must contain a description of the nonpoint source Best Management Practices or management measures and associated costs needed to achieve load reductions for the critical areas identified in which the measures will need to be implemented to achieve the nonpoint source TMDL.

Section 7 of the NEMO plan describes a variety of nonpoint source BMPs that may be applied for load reduction and management of metals, sediment, organics and selenium pollution.

Section 8 includes an example water quality improvement project for each of the four constituents (metals, sediment, organics and selenium) with specific example management measures.
Element 4: Technical and Financial Assistance.
NEMO Sections 7 and 8, and NEMO website www.ArizonaNEMO.org

The plan must include an estimate of the technical and financial assistance needed, including associated costs, and funding strategy (funding sources), and authorities the state anticipates having to rely on to implement the plan.

Section 7 includes several tables that include various management measures and their relative costs, life expectancy and load reduction potential.

Section 8 includes a list of possible funding sources and links for water quality improvement projects. In addition, the NEMO website (www.ArizonaNEMO.org) has an extensive list of links to a wide variety of funding sources.

Element 5: Information / Education Component.
NEMO Section 8

This is the information/education component intended to enhance public understanding and participation in selecting, designing, and implementing the nonpoint source management measures, including the outreach strategy with long and short term goals, and funding strategy.

Section 8 lists local resources that may be valuable in education and outreach to the local community or other targeted audiences. In addition, examples of local educational outreach projects are presented.

Element 6: Schedule.
NEMO Section 8

The plan must include a schedule for implementing, operating and maintaining the nonpoint source Best Management Practices identified in the plan.

Section 8 describes the importance of schedules in a water quality improvement project and presents an example schedule.

Element 7: Measurable Milestones.
NEMO Section 8

The plan must include a schedule of interim, measurable milestones for determining whether nonpoint source Best Management Practices or other control actions are being implemented and water quality improvements are occurring.

Section 8 describes some measurable milestones and presents an example schedule that includes milestones.

Element 8: Evaluation of Progress.
NEMO Section 8

The plan must contain a set of criteria used to determine whether load reductions are being achieved and substantial progress is being made towards attaining water quality standards, including criteria for determining whether the plan needs to be revised or if the Total Maximum Daily Load (TMDL) needs to be revised.

Section 8 describes how to evaluate the progress and success of a water quality improvement project and describes the
key attributes that must be met for a successful project.

Element 9: Effectiveness Monitoring.
Section 8

The plan must include a monitoring plan to evaluate the effectiveness of implementation efforts over time, measured against the set of criteria established in the Evaluation of Progress element (8).

Section 8 discusses the importance of project monitoring, and presents several example water quality and health constituents that should be monitored.

Conclusions

The NEMO Watershed based plans are structured to be a watershed wide, broad evaluation of the nine key elements. The community watershed groups, as they apply for 319 Grant Funds to implement projects, will need to readdress each of these 9 key elements for their specific watershed project.