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March 16, 2026

Mr. Jeffrey Hall
Assistant Administrator
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency

To: USEPA Office of Enforcement and Compliance Assurance

Re: EPA OECA National Clean Water Program Priorities

Mr. Hall,

Congratulations on your appointment as Assistant Administrator for the Office of Enforcement and Compliance Assurance (OECA). We wish you great success in this new role.

The Association of Clean Water Administrators (ACWA) represents state, interstate, and territorial water program managers who implement the Clean Water Act (CWA), including the National Pollutant Discharge Elimination System (NPDES) program. Forty-seven states are currently authorized to issue NPDES permits, with New Mexico now working through the authorization process. States conduct the vast majority of environmental permitting, inspections, compliance, and enforcement activities nationwide, with the Environmental Council of States estimating states issue or manage more than 90% of all environmental permits under delegated/authorized authority.

Many of EPA's priorities directly align with those of the states. State programs ensure access to clean water, support critical permitting for energy, AI, and automotive sector projects, streamline processes to reduce backlog, and work to strengthen cooperative federalism. States also continue to lead efforts to improve efficiency, reduce unnecessary burdens, enhance compliance, and apply modern process improvement tools—including LEAN, Six Sigma, Kaizen, etc. and emerging AI capabilities—to improve program outcomes.

Several ongoing/historical OECA initiatives reflect shared priorities and would benefit from your continued engagement:

- **National Targeting Center (NTC)** – States support strengthening data-driven targeting and analytics to make the most efficient use of limited inspection resources.

- **NPDES eReporting Rule Implementation** – Thirty-five states requested extensions, with several relying on EPA contractor assistance to complete implementation. States support continued federal funding of planned resources and would appreciate real time updates as these resources become available.
- **ICIS Modernization** – States value the collaborative work underway to modernize ICIS and support sustained funding and stakeholder engagement to ensure long-term success.
- **Burdensome Policies** – Early ICIS Modernization discussions identified opportunities to reduce unnecessary data burdens and improve data quality. States support OECA’s efforts to address these challenges.
- **Offsite Compliance Monitoring (OfCM)** – States encourage further evaluation, discussion, and use of OfCM practices that proved essential during the pandemic and continue to provide meaningful compliance assurance benefits.
- **NPDES Noncompliance Report** – States appreciate and support continued efforts to improve the quality and usefulness of the NNCR.
- **NPDES Enforcement Framework (NEF)** – States support updating the Significant Noncompliance (SNC) policy and advancing a modernized violation-scoring system that better reflects environmental and public-health risks across a larger universe of facilities/violations.
- **Inspector and Compliance Training** – States support continued investment in training crucial for building state capacity and maintaining certifications.
- **State Review Framework (SRF)** – States support refinements to ensure SRF reports accurately reflect state performance, federal requirements, and agreed-upon commitments.
- **OECA Participation at National Meetings** – Continued participation at national meetings by OECA leadership and staff is highly valued and essential for addressing program challenges and strengthening state-federal collaboration.

We look forward to continuing to work closely with your office to advance our shared goals and to strengthen state capacity through technical assistance, training, and enhanced collaborative tools. If you have any questions or would like to schedule a call/meeting to further discuss any of these initiatives, please contact ACWA Executive Director Julia Anastasio at janastasio@acwa-us.org or (202) 756-0600.

Sincerely,

Julia Anastasio



CC:

Jacqueline Werner, Director, Office of Compliance

Kellie Ortega, Deputy Director, Office of Compliance

Jane Wallace, Director, Office of Compliance, Enforcement IT and Data Division

Jason Swift, Deputy Director, Office of Compliance, Enforcement IT and Data Division

Loren Denton, Director, Office of Compliance, Compliance, Inspector, and Training Division

Elizabeth Ragnauth, Deputy Director, Office of Compliance, Compliance, Inspector, and Training Division

Michele McKeever, Director, Office of Compliance Planning, Measures, and Evaluation Division

Joseph Theis, Acting Director, Office of Civil Enforcement, Water Enforcement Division