



Executive Summary

ACWA's Watershed Committee initiated a comprehensive review of state experiences, priorities, and needs related to the 303(d) and Total Maximum Daily Load (TMDL) program. Through structured interviews conducted by Committee Co-Chair Traci Iott and ACWA staff member Jasper Hobbs, state staff provided detailed insights on program direction, technical capacity, and implementation challenges.

Evolving Priorities Under the Vision 2.0 Framework

States continue to prioritize strengthening their TMDL programs, with a particular focus on updating older TMDLs from the mid-2000s and shifting toward more proactive, watershed-based planning. As "Vision 2.0" is underway, many states are focusing on watershed-scale planning, measurable outcomes, and protection of high-quality waters. Interest is growing in Advanced Restoration Plans (ARPs), protection strategies, and other tools that support early intervention and long-term water quality improvements. Nutrients and bacteria remain the most frequent causes of impairment, tied to issues such as eutrophication, harmful algal blooms, and source water protection. Other concerns—chloride, sediment, metals, PFAS, and aluminum—also feature prominently.

Many states are beginning to incorporate broader policy goals into their prioritization frameworks, including environmental justice, tribal coordination, and climate resilience. However, they noted uncertainty about how to operationalize these concepts within existing regulatory structures. Public engagement and transparency are gaining importance, especially as states develop Vision 2.0 strategies and seek to align TMDL/303(d) work with other Clean Water Act programs, including 319 nonpoint source management, permitting, and biological monitoring.

Overall, the Vision 2.0 framework is viewed as an opportunity to create stronger, more holistic restoration strategies.

Technical Needs, Systemic Challenges, and Desired Flexibility

States consistently emphasized the need for improved technical resources. Enhancing modeling capabilities, especially for nutrient dynamics and lake systems, was a common request. Many states also highlighted ongoing challenges in integrating data across assessment, monitoring, and TMDL development. Tools such as EPA's Recovery Potential Screening (RPS) Tool are being used to inform prioritization, but additional training, peer learning, and access to open-source options would help build confidence and reduce reliance on contractors.

States with more robust technical capacities frequently serve as informal mentors, while lower-capacity programs expressed a need for more structured support and shared resources.

Across the country, states shared similar barriers: limited staffing, constrained funding, and the need for greater flexibility in setting and tracking priorities. While national coordination and consistency are

valued, respondents emphasized that state programs function best when they can tailor their approaches to local conditions and unique watershed needs.

Conclusion

Overall, the perspectives shared through this interview process highlight a national TMDL/303(d) program that is evolving to meet modern water quality challenges while striving to build the capacity, flexibility, and partnerships needed for long-term success. States are clearly committed to strengthening their technical foundations, advancing watershed-based planning, and incorporating emerging priorities such as environmental justice and climate resilience. At the same time, they face ongoing constraints in staffing, funding, and data integration that underscore the importance of sustained collaboration with EPA, ACWA, and peer programs. As states continue to refine their Vision 2.0 strategies, the themes identified here point toward a future where more adaptive, coordinated, and community-informed approaches can better protect and restore the nation's waters.