

Approaches to Mitigating the Effects of Staff Turnover on The Clean Water Act 303(d) Program/ Examples from Practice: Environmental Law Institute Report



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The Environmental Law Institute (“ELI”) has issued a report titled Approaches to Mitigating the Effects of Staff Turnover on the CWA 303(d) program.

Examples from Practice (“Report”)

The Report was stated to have been undertaken pursuant to a cooperative agreement with the Watershed Branch of the United States Environmental Protection Agency (“EPA”).

See Cooperative Agreement No. X7-84039001-0

Agency staff turnover is cited as a potential disruption of the flow of work, including delay in progress towards achieving programmatic goals. The associated problems can include:

- Time required to get a new staff person familiar enough with the job to do it well.
- Loss of institutional knowledge and experience.
- Loss of professional connections.

State, Tribal and Territorial water quality programs are stated to have developed a variety of policies and practices to mitigate the effects of staff turnover. Some of these policies and practices are categorized and summarized by ELI’s report. The information is stated to have originated from:

...responses of State and Territorial CWA 303(d) program staff and Tribal water quality program staff [hereinafter “program staff”] for, and presentations during, the 2022 National Training Workshop on Water Quality Data, Assessment, and Plans, an event convened by ELI through a cooperative agreement with the EPA. Follow-up conversations by ELI staff supplement those materials.

Topics addressed in the report include:

- Document creation practices.
- Document maintenance practices.
- Organization Practices.
- Ways of using digital infrastructure.
- Deliberate integration of new staff into the program,
- Staff training.

The Arkansas Department of Energy and Environment – Division of Environmental Quality is cited as one of the state agencies that utilize standard operating procedures (SOPs);

...as a valuable means of communicating regular aspects and tasks associated with different programs.

The Report further notes that:

For example, Arkansas has an SOP for wadable stream sampling protocols.. amongst other tasks.

Under the adding of (internal trainings) any work with the Arkansas Department of Environment – Division of Environmental Quality (“ADEQ”). ADEQ staff are stated to have developed digital platform, called myARLearning:

...which guides new staff through several program documents via learning modules, quizzes, and videos.

ELI describes itself as an;

...internationally recognized non-partisan research publishing, and education center working to strengthen environmental protection by improving law and governance worldwide.

A copy of the report can be downloaded [here](#).