

**AREAWIDE
WATER QUALITY
MANAGEMENT
PROGRAM
SURVEY**

MARCH 1977

SUMMARY

PREPARED FOR
WATER PLANNING DIVISION
ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

PREFACE

This is a summary of the second round in a series of surveys of areawide water quality management (WQM) agencies. These surveys are being conducted for the Water Planning Division of the Environmental Protection Agency, Washington, D.C. by Centaur Management Consultants under Contract No. 68-01-3577. The first survey in these series was documented in two reports: "Areawide Water Quality Management Program Survey Summary" dated August, 1976; and "Areawide Water Quality Management Program Survey" dated October, 1976.

This survey was conducted solely by telephone in February of 1977. The survey format was transmitted to each of the WQM agencies and to the EPA Regional Offices prior to the telephone contacts. The survey structure as described below was modified by the unique characteristics of each agency. The actual questions asked of the various local interviewees over the telephone reflect our previous understanding of each agency's achievements, problems, and progress to date. A list of interviewees is in the Appendix.

The theme of this survey is to assess progress toward plan implementation. In order to assess the sample agencies' performance, the following three issues were discussed.

1. Nonpoint Source Problems - For each areawide agency, a specific nonpoint source problem was selected for discussion. The nonpoint source problem selected was not necessarily among the reasons cited for initial designation, however in each case it does represent a priority concern identified in the agency's profile prepared for the EPA Water Planning Division. Interviewees were asked such questions as: How was the issue defined? To what extent will it be corrected as a result of the WQM program? When will plan recommendations be implemented?
2. Facilities-Related Plan Elements - Interviewees were asked whether WQM interim and final plan outputs influence current and future wastewater treatment facilities decisions. And, if so, in what way will this happen?
3. Role of WQM Planning in the NPDES Permit Process - Interviewees were asked whether WQM interim outputs as well as the final WQM plan will influence the next round of NPDES permits. If the WQM plan will not be ready for the next round, how do interviewees think it will influence future NPDES permitting activities?

In order to obtain a broad perspective on the WQM program, a variety of persons were interviewed in each project area. Included among the interviewees were the WQM Project Director, the EPA Regional Project Officer, the State water quality agency liaison, local elected officials and citizens. Whenever possible, the survey team interviewed the same persons who participated in Centaur's previous WQM survey.

This summary reviews the progress that has been made since the last survey of five common issues affecting a sample of 19 Water Quality Management agencies. This is a summary report of over 138 interviews. A more detailed description of these interviews in the form of case studies is the subject of a separate report.

This round of the WQM survey was directed by Ms. Jane Nowak. Assisting her were Cheryl Dinneen, Ann Hoffman, and Constance Castle. Centaur appreciates the useful guidance provided by Ms. Pat Cohn, the EPA Project Officer.

Michael L. Frankel
Centaur Management Consultants, Inc.

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PUBLIC PARTICIPATION

In the August 1976 survey, Centaur found that the character of public involvement programs varied among WQM agencies depending on the public's perception of its water quality problems, the extent of public involvement in other planning programs in the area, the WQM agency's own experience with public involvement activities, as well as economic, geographic and political factors which characterize the WQM area.

About half of the WQM agencies surveyed were satisfied with the general public's involvement while the remaining were either partially dissatisfied or totally frustrated with the program. Dissatisfaction with involvement of local elected officials ran even higher. In many instances, planners felt they had done all they could to facilitate and encourage participation. They expected attendance at meetings to rise as recommendations became more clearly defined and issues became politically meaningful.

Members of the general public and local elected officials who were involved in the WQM program were generally pleased with the opportunity to participate, but most did not feel sufficiently informed about the intent or potential implications of the WQM program. They shared the staff's frustration in cultivating sustained public interest.

Six months later in the March 1977 telephone survey public involvement was again viewed as a mixed bag of successes and frustrations. The following points illustrate the key features of the public participation programs.

- Very few new active interest groups, local officials or interested individuals have risen in support of the WQM program. The most consistent participants are watershed associations and other environmental groups who were interested in water quality planning before the WQM program began.
- The general trend is toward a decline in attendance at advisory committee meetings as the WQM projects proceed through their data gathering stages. Until alternative solutions are recommended, it is hard to arouse interest among citizens and elected officials.
- Insufficient data to substantiate site-specific problems and recommendations have frustrated attempts to engender public interest and official support on the local level. The Sussex County spray irrigation recommendation is a marked contrast to this dilemma.

- Local economic development and water quality planning often appear incompatible in the eyes of local officials and the general public. Public and local elected officials support also may wane as consumers are made aware of the costs associated with plan recommendations.
- Public participation programs have been most effective where WQM planning activities are tied into other ongoing planning concerns. In these cases public involvement has developed over many years.
- Public participation programs also work well when they are geared specifically to those who stand to be affected directly by the WQM program. For example, increased farm productivity as a result of implementing a spray irrigation recommendation has brought favorable support of the Sussex County WQM plan. The same is true for the manure retention pit recommendations made in the Southeast Wisconsin plan.
- In some places where the WQM program has been unable to activate public participation throughout the planning process, WQM agencies are relying on public participation elements in related planning projects. More specifically, many are relying on the public meeting element in the WQM environmental assessment process or EIS process for ongoing facilities plans.
- Most WQM agencies recognize the need for public support in order to implement voluntary programs. Voluntary program solutions are often politically more attractive than regulatory programs but they also require considerable public support if they are to be effective.
- WQM agencies are still optimistic about an increase in public input as the planning process nears development and selection of specific WQM recommendations.
- Some WQM agencies that deliberately chose not to involve local elected officials (in some cases because of the large number of officials involved) until firm alternatives were developed are becoming concerned about the advisability of such a decision. These agencies now recognize the potential problems of securing local plan approval and support.
- Some WQM agencies have built up local support by proffering politically favorable recommendations and highly visible demonstration projects. Some of the acceptable

recommendations have been those that are incremental and non-revolutionary.

- Where local officials recognize that the WQM plan can serve to promote other local objectives (e.g., growth control), officials tend to be very receptive to the WQM program. However, the opposite is true in those areas that are traditionally against land use controls and any loss of local control to some regional authority. ●
- In Martha's Vineyard, the WQM Project Director has chosen to reach local officials through direct personal contact. Such a system may impair the future of the WQM program in that the support may be lost with a change in personnel.
- In a number of cases where WQM staffs were satisfied with the general public's involvement in the WQM program, citizens were dissatisfied with their role. Some feel that the programs are not really responsive to public concerns but are rather either seeking public confirmation of the staff's direction or merely responding symbolically to EPA requirements.
- Where WQM agencies have failed in their concerted efforts to establish public participation programs, citizens and local officials rarely blame the WQM staff. Rather, they tend to blame the general apathy of the public and the overwhelming competition of other, more apparently critical concerns.

ACHIEVEMENTS TO DATE

In the August 1976 survey, interviewees cited achievements in four major categories: technical, institutional, management and public involvement. Because many agencies were still in early stages of planning, most achievements were noted in technical areas, particularly in establishing better planning data bases. Institutional achievements were usually defined in terms of providing a forum for better communication between and cooperation among local communities with common problems. Further substantive changes in institutional arrangements were anticipated later in the WQM planning process. A few WQM planning agencies had already succeeded in getting management solutions implemented before final plan completion and approval. Some had undertaken demonstration projects to prove the validity and efficiency of their suggestions. Achievements in the area of public participation tended to be subtle in nature, taking the form of constituency building and support-gathering.

Since the March 1977 WQM survey concentrated on three program elements (i.e., nonpoint sources, facilities planning and NPDES permitting), the record of achievements that follows is grouped into these categories.

Achievements in the Area of Nonpoint Sources of Pollution

- Even while analyzing longer-term corrective measures, OKI is recommending interim solutions to mitigate the combined sewer overflow problem. In many instances such incremental approaches are politically more acceptable in view of the cost of final solutions and in view of major changes that may be required in switching from local to regional controls.
- Seattle-METRO is focusing much of its nonpoint source efforts in two demonstration areas. By dealing with weed control and urban storm runoff on a site-specific basis, the WQM program has been able to develop and analyze remedial alternatives in detail. This approach has rendered validity to the planning program and has heightened the public and local officials interest in the WQM program.
- The Sussex County, Delaware WQM program has convinced the County Council to adopt a spray irrigation program for municipal effluent disposal. This procedure has resulted in a cost savings of \$10 million and has eliminated the need for a controversial ocean outfall. Spray irrigation has directly benefited farmers by increasing the productivity of receiving lands.

- Local Boards of Health on Martha's Vineyard have adopted WQM staff suggestions on revised septic system codes. More restrictive codes should help alleviate the need for structural solutions to domestic wastewater elimination.
- In the Chattanooga WQM study area, initial steps toward creating an interstate association of five Soil Conservation Service districts have been taken. The association will examine urban and rural runoff problems in further detail and may seek some regulatory authority to implement necessary activities such as erosion control ordinances.
- In Southeastern Wisconsin, WQM planning is already influencing the nature of programs supported by the Soil and Water Conservation Boards and the type of public information the Boards disseminate. Close coordination between WQM agencies and SCS offices has proved generally very helpful to WQM planning and implementation wherever such coordination takes place.
- The Augusta WQM program identified the primary cause of lake pollution to be one of manure runoff and developed a straightforward pit retention solution to the problem. The regional planning commission has also developed a procedure to finance the solution through lump sum Agricultural Stabilization and Conservation Service grants.
- Southeast Montana is anticipating a great deal of energy development with associated water pollution. The WQM program has suggested concentrating this pollution in a river already subjected to natural pollution. In the local communities opinion, "sacrificing" one river is far less costly than diluting pollution across a number of cleaner rivers.
- Coordination between the WQM program and a concurrent regional land use program has been working very successfully in Ventura County. This close working arrangement has not only proved efficient (e.g., the four participating planning projects have been able to economize by jointly funding common data gathering efforts), but also has lent greater visibility to the WQM planning effort and will ensure that water quality concerns will be considered in other planning programs, particularly in determining growth patterns.

- Data generated by the Houston WQM study is being used in a regional flood plains study.
- Close coordination between the Southeastern Wisconsin WQM study and the ongoing State water planning program has lent credence and support to the WQM study, especially in the eyes of farmers. Indeed, specific achievements of the WQM program are difficult to separate from the very effective ongoing State program.
- In southeastern Montana, the Yellowstone-Tongue WQM agency has supplied data for environmental impact statements on two proposed nuclear power projects in the study area.
- In Chattanooga, the WQM agency has completed an inventory and evaluation of the area's nonpoint source problems. It is also nearing completion of waste loadings by dominant land uses and is about to prepare BMPs for a variety of potential nonpoint source pollutants.
- The Lower Rio Grande planning program has established a successful public education program demonstrating the relationship between water quality, water quantity and local economic well-being. The area recognizes its dependence on a limited water supply and therefore supports its WQM fact finding efforts.

Achievements Related to Facilities Planning

- All WQM agencies with A-95 review responsibility indicated that they will rely chiefly on WQM data and planning in reviewing facilities grant applications.
- A number of WQM agencies are already using WQM data to assist local communities conduct facilities planning. In the Philadelphia area, the State is requiring all communities to update their local sewer plans to comply with the WQM plan.
- In Teton County and Martha's Vineyard, the WQM agencies are supplying data for environmental impact statements on proposed facilities construction projects.

- In many areas, the WQM program has helped bring about a regional and local consensus on population and land use projections.

Achievements Related to NPDES Permitting

- Although NPDES permitting is not a major planning concern in most WQM projects, several WQM agencies reported that their data is being used to issue permits. However, in several instances the development of WQM data will not be available in time for the re-issuance of permits.

OUTLOOK FOR IMPLEMENTATION

In August 1976, expectations regarding WQM plan approval and implementation were highly speculative. Most interviewees assumed a position of "watchful waiting" for the final plan. They expected implementation to hinge upon the nature of final plan recommendations, availability of continuing funding and extent of local political support. Generally acknowledging the low visibility of water quality issues, WQM planning agencies were attempting to make incremental steps toward plan implementation.

Nearly all WQM agencies were focusing on the use of existing legislation and management agencies with some clarification, expansion or regionalization of institutional arrangements where necessary. In the area of nonpoint source problems, in particular, most WQM agencies anticipated solutions on the local or county level rather than the State level. A trend toward promoting voluntary rather than regulatory solutions to nonpoint sources appeared widespread because of the greater politically acceptability of such an approach. Because Federal funding is available for treatment facilities, point source plan elements were expected to be among the first implemented.

Most commonly anticipated barriers to implementation were related to the interlinked questions of funding and political support. In order to overcome implementation difficulties, WQM agencies were attempting to involve persons essential to plan implementation early in the process. Most of this involvement was taking place through formal advisory committee structures. Linking WQM planning functions and activities with related planning functions and activities was seen as important to plan implementation.

The findings of the March 1977 survey support the earlier indication that funding and political support are the keys to plan implementation. Also of major importance are the lack of time to develop data to sufficiently substantiate the recommendations, and to overcome anti-regionalization sentiments and conflicts between environmental planning and other community priorities.

The following points illustrate some of the specific outlooks for implementation:

- The most commonly cited barrier to plan implementation is availability of funds to finance solutions to combined sewer overflow problems. At OKI for instance, solutions to combined sewer overflow problems will necessarily entail large

expenditures which can only be financed at this time by substantial increases in local sewer rates. At Augusta and in Southeastern Wisconsin, nonpoint sources of pollution will have to be solved by farmers on an individual basis. Implementation of these voluntary programs will depend on the availability of States or Federal funding.

- Regionalization of wastewater treatment management agencies and other pollution control programs will rarely if ever occur as a result of WQM planning. Most WQM agencies that had considered promoting such an option are doing so cautiously to avoid alienating local communities which are very protective of local turf. Even where they are politically acceptable, regionalization programs will take a long time to materialize because of the administrative, financial and legal technicalities involved.
- Very protective attitudes about local autonomy will prove strong barriers to WQM plan implementation in some areas. In other areas, WQM agencies have used local autonomy arguments to their favor. In Maine and California, for example, communities are being encouraged to seize the opportunity to do areawide WQM planning or face the consequence of State or Federally prepared plans and programs.
- In a number of areas, data collected in the two year WQM planning period will not be sufficient to convince local decision-makers to implement plan recommendations. The Houston WQM agency feels it can only make general suggestions for remedial action. Specific recommendations are contingent upon further study. In Philadelphia, it appears that the WQM agency will not have the time or data to use a new water quality model being developed by the State. Local communities are unlikely to implement WQM recommendations if they feel these suggestions are based on faulty or incomplete data.

- The timeliness of the WQM plan vis-a-vis other community concerns will greatly influence the likelihood of plan implementation. In South-eastern Montana, for example, lack of immediate development pressure has removed the critical edge from WQM planning. Although the timing of the WQM study is appropriate to planning in advance of energy development impacts, the lack of immediately felt development pressures may allow local support and interest in continuing technical analyses and coordinating with energy development-related projects to wane.
- Similarly, the Ventura County WQM program is considered clearly supportive of local desires to maintain the region's agricultural economic base and to curb future growth. In Martha's Vineyard, on the other hand, WQM planning appears to be somewhat out of step with local economic priorities. Some Islanders have not been convinced yet that the Vineyard's future economic well-being is directly tied to environmental quality. Implementation of WQM recommendations will probably come more slowly in the latter area.
- Implementation of WQM planning recommendations for solving nonpoint source pollution problems was already beginning in the Chattanooga area as a result of forming an association of five Soil Conservation Districts in the area. The association will generally work through education and voluntary programs but will also provide regulatory controls such as erosion control ordinances which were being considered at the time of interviews.
- The Mid-America Regional Planning Commission has established communications among communities with common problems. Such cooperative discussions are unique in the Kansas City area which has been wrought with strong interstate rivalry, home rule supremacy and anti-regionalism sentiments.
- In a number of WQM areas where States have rendered strong support in the form of data exchange, technical assistance, promise of complementary legislative or regulatory assistance, etc., the outlook for WQM plan implementation is very hopeful. This is particularly true in those areas such as South-eastern Wisconsin where WQM planning is so closely

integrated with ongoing State planning for water quality management. Affiliation with politically favorable State programs lends credence to the WQM plan.

- In Ventura, the association of WQM planning with concurrent environmental and land use planning has increased the chances of considering water quality constraints in future planning and decision making.
- In Seattle, METRO is lobbying to make structural solutions to urban storm runoff problems eligible for facilities construction funds. In Maine, the State Department of Environmental Protection is promoting the partial use of facilities construction funds for septic system projects which are often less costly and more environmentally sound for the Augusta region. Such fiscal arrangements should help WQM areas overcome financial difficulties of plan implementation.
- A few WQM agencies that made a conscious decision to delay concentrated public participation programs until the last stages of the planning program are now worried that absence of citizen and local elected officials' participation throughout the process may hinder or at least delay implementation.
- At Martha's Vineyard, contact with local elected officials has depended almost solely on personal contacts by the WQM Project Director. Implementation of the WQM plan may take several years. If the Project Director leaves his position, the future of the plan may be impaired.
- In order to increase the likelihood of implementation, some WQM agencies have chosen to directly involve potential plan implementors from the very early stages of WQM planning.
- OKI is trying to skirt implementation barriers that are anticipated when the final plan emerges by promoting partial implementation throughout the planning period.

- Plan approval and implementation in several areas may be delayed because of problems in securing State certification. At OKI, pro-development state sentiments may conflict with WQM recommendations. At Martha's Vineyard, the State has issued a late request for a regional growth policy paper before it will consider plan certification.
- Dayton's outlook for plan approval and implementation is somewhat clouded by the WQM program's lack of funds to recover from initial program problems. With only a skeleton crew remaining, Dayton's ability to promote the plan is limited.
- Sussex County's WQM program is already benefitting from the advice and precedence of the neighboring WQM program in New Castle County.
- In Middlesex, New Jersey on the other hand, lack of coordination among areawide WQM programs within the State may prove detrimental to plan implementation.
- The best outlook for implementation exists in those areas with one or more of the following characteristics:
 - Well-defined problems
 - An existing effective land use plan
 - A single or compact political jurisdiction
 - Widespread no-growth support
 - An immediate water quality or quantity crisis
 - Interest in preserving agricultural land
 - Active State support.

RELATIONSHIP WITH OTHER WATER QUALITY PROGRAM ELEMENTS

Even in the early stages, WQM planning was both being affected and also influencing facilities construction planning and NPDES permitting. Some WQM agencies were rendering extensive planning and grantsmanship assistance to local communities where new facilities were needed. In areas where facilities planning was far advanced or where additional facilities were not needed, WQM agencies incorporated these givens into their other planning outlooks. Some citizens were dismayed that construction activities had not been delayed until completion of WQM plans. Several WQM agencies expressed concern that the States would not back up WQM suggestions on facilities issues and would thereby also jeopardize the effectiveness of other WQM plan elements. Many others felt certain that WQM planning would affect the size, location and timing of future construction, but were unable to explain how this influence would take place. WQM planning was not expected to cause much regionalization of management agencies.

Some agencies expected to influence future State and NPDES permitting by supplying better data on wasteload allocations. Most often, however, respondents did not expect WQM planning and permitting would influence each other.

During the March 1977 survey, WQM agencies reported that WQM planning data was being used as an input to the facilities planning process especially through the environmental assessment and EIS process. The need to think about regional facilities also creates a favorable environment to overcome traditional self-interests among neighboring communities. Furthermore, in those instances where the EPA and States actually sought WQM plan inputs in the facilities planning process, the WQM agency gained measurable support for its work. In the area of NPDES coordination, the timing of the WQM planning effort is such that it will have limited input to the next round of permit reviews. In those instances where the State has delegated the NPDES authority down to a regional level, the potential for WQM planning influence is much better.

The following are highlights of the March 1977 survey:

Facilities Construction Planning

- Most WQM agencies expect to have an influence on future facilities construction planning and decision-making through the use of projections as well as service area delineations prepared under WQM planning and also through the WQM agencies' A-95 review roles. Where facilities planning is already far advanced, the WQM agencies are generally incorporating local plans into the final WQM plan.

- Those WQM agencies which were involved in local planning assistance programs before the WQM program began probably will be most successful in influencing future local facilities planning efforts. In Southeastern Wisconsin, for example, the WQM agency feels it can render better assistance to local facilities planning projects since it now has more complete data.
- In Salem, the WQM agency had a history of active participation in local facilities planning. Trusting that requests for local assistance would continue, the WQM agency chosen to concentrate much of its time on other planning concerns not covered in other programs.
- In Ventura, coordination between WQM planning and facilities planning is guaranteed since the WQM agency is also the facilities planning and management agency for the region. Similarly in Augusta, the permanent sewer and Water Committee of the regional planning commission is also engaged in WQM planning advisory roles.
- Involvement of the OKI WQM agency in local facilities planning has lent the overall WQM project greater visibility and support.
- WQM interim outputs are being used by consultants doing facilities planning in the Dayton area. The WQM agency also meets with all consultants to ensure that local facilities plans are consistent with the areawide WQM plan.
- Residents in the Kansas City WQM area believe EPA is delaying decisions on facilities construction grants until the areawide WQM plan is completed and taken into consideration. The Philadelphia WQM agency similarly noted that the State is withholding grant approvals until the WQM plan is finalized.
- In Pennsylvania, the State is requiring all communities to update their mandatory sewer plans to ensure compliance with the WQM plan.
- WQM planning will have minimal involvement in local facilities planning in the Houston-Galveston area because of strong local planning and management agencies which already exist in the area.
- The Teton County WQM agency is assisting in facility planning by providing data for an EIS on the Jackson Treatment Plant. The Martha's Vineyard WQM agency is also contributing data for an

environmental impact assessment at this time.

- Seattle-METRO has prepared a regional facilities plan under a separate planning program grant. The agency is using the WQM program to promote alternatives to secondary treatment (required by P.L. 92-500) which the area finds costly and of little comensurate benefit.
- In Sussex County the WQM Project Director has been named County Engineer. This situation should ensure careful coordination between the WQM plan and facilities planning in the region.
- At Martha's Vineyard, the State and the areawide WQM agency appear to be somewhat at odds on facilities recommendations in that the WQM agency is strongly in favor of non-structural solutions to wastewater treatment needs. How effective the WQM plan will be depends on the WQM agency's success in convincing local communities of non-structural solutions overall benefits - both economically and environmentally.
- Although a few WQM agencies are giving serious thought and planning time to the merit and feasibility of regionalizing wastewater treatment management agencies, none expect to make any great institutional changes in the near future. The reason most often cited is protective self-interests of local management agencies and individual communities.
- In the Kansas City area, the wastewater treatment management system will not change dramatically, but the WQM program has helped bring previously alienated communities together to discuss the possibility of regionalization.

NPDES Permitting

- About half of the WQM agencies interviewed expect their WQM plans will have some influence on future NPDES permitting. Some agencies were not sure yet, however, how this influence will take place. Most States have not signed official agreements or made specific coordination arrangements with the WQM agencies. Some WQM agencies such as Houston also indicated that their plans will be completed too late to influence the current round of permitting.

- Missouri is requiring that all future NPDES permits comply with areawide WQM plans. The same is true in Wisconsin by virtue of State law.
- The influence of WQM planning on NPDES permits is somewhat uncertain for OKI and Dayton depending on State certification. In the case of Dayton the State EPA has no strategy for supporting WQM planning outputs in the permit process. Furthermore, it is doubtful that the WQM data can substantiate wasteload or water quality standards issues for the permit process.
- The State of Washington has delegated NPDES permitting authority on all discharges to the Seattle - METRO system to Seattle - METRO itself. The WQM agency is therefore guaranteed input into permitting decisions.
- The Salem WQM planning agency views NPDES permitting as the total responsibility of the State. Salem, therefore is not planning to become involved in future permitting. In Chattanooga, permitting is viewed as a Federal responsibility, again outside the purview of areawide WQM planning.
- In Middlesex, New Jersey, the NPDES permitting issues is viewed as too massive for consideration in the WQM program. On the other hand, some WQM planning areas such as Augusta and Ft. Meyers have so few industrial dischargers that NPDES permitting is considered a moot issue.

STATE PARTNERSHIP

At the time of the August 1976 WQM program survey, States were still defining and developing their relationship to areawide WQM planning agencies. Many States were emerging as more active participants in response to the 1975 court decision mandating statewide responsibility for WQM planning. WQM agencies were generally most satisfied with State relationships when States had taken on a partnership role involving active assistance, mutual information exchange, and respect for local priorities. Many States were still unclear about the way WQM plans would be integrated with plans for non-designated areas. Most felt, however, that State coordination and review throughout the WQM process would eliminate potential conflicts between areawide and State WQM plans.

By the time of the March 1977 WQM program survey, States had generally settled into a defined role in areawide WQM planning. Most States are still engaged primarily in technical assistance, review and coordination activities. For some, this role remains a passive "watchdog" responsibility in which the State only becomes directly involved upon the request of the areawide planning agency. Other States have taken a far more active role in initiating activities and paving the way toward WQM plan implementation. The procedure for incorporating areawide plans into State WQM plan for the most part remains uncertain.

The following are specific highlights of the March 1977 survey on State partnership:

- The Philadelphia and Southeast Wisconsin WQM programs are closely coordinating with ongoing State water quality planning programs. In both areas, areawide WQM plans will be incorporated directly into the State plans. It is very probable that much of the planning being conducted under the WQM program would have been undertaken by the State programs although perhaps at a later date or a lower level of detail.
- Maine and Wisconsin are presently considering statewide regulatory programs in support of areawide WQM planning. These legislative packages are being developed in close cooperation with areawide WQM programs throughout each State.
- Maine and Pennsylvania have already outlined procedures for utilizing WQM interim outputs in facilities construction decisions.

- Several States are directly responsible for areawide WQM plan elements. Texas, for example, is developing urban runoff models for the Houston-Galveston program. The Philadelphia WQM program contacted with the Pennsylvania Department of Environmental Resources to oversee all technical subcontract work since the WQM agency itself did not have resident expertise in technical areas to be studied.
- The Montana Water Quality Bureau has made a full-time staff engineer available to the Yellowstone-Tongue Areawide Planning Organization for use in WQM planning. As a newly created single purpose agency, YTAPO greatly benefitted from qualified technical expertise familiar with the area's water quality problems.
- Ventura County's relationship with the California Water Resources Board is characterized by strong State support and diligent monitoring and review of the areawide WQM program. The State, however, falls short of taking initiative in offering assistance or guidance to Ventura. California, Florida and a number of other States that feel confident in an areawide program are taking a "low profile" apparently to avoid threatening local communities with outside interference.
- In Chattanooga, the State of Georgia is not actively involved in the WQM program's nonpoint source work because its main interest lies in facilities construction. Nevertheless, Georgia is supportive of Chattanooga's efforts in the nonpoint source area. Tennessee has had limited involvement in the Chattanooga program because of State staffing problems. The State however has hired a consultant to coordinate all areawide WQM plans in the region.
- Dayton's relationship with the State has been somewhat hampered by frequent changes in State assigned liaisons. These changes have disrupted continuity and necessarily slowed down the areawide planning program. In addition, the State's proposed procedure for State certification of the WQM plan is very complicated and

may overload Dayton's remaining WQM planning resources.

- The Martha's Vineyard WQM program had proceeded without much State involvement until the latter stages of the WQM planning period. Late State announcements concerning pre-conditions for certification will greatly burden the WQM planning agency as it nears plan completion. The State and the Martha's Vineyard WQM program also disagree on structural vs. non-structural approaches to wastewater treatment and disposal on the Island. The WQM planning agency favors the use of septic systems but the State still prefers conventional structural solutions.
- The Middlesex County, New Jersey WQM program is apparently suffering from the lack of State coordination among neighboring areawide WQM programs studying similar water quality problems in the region.

APPENDIX

INTERVIEWEES

<u>WQM Study Area</u>	<u>WQM Project Directors</u>	<u>EPA Regional Project Officers</u>	<u>State Liaisons</u>	<u>Local Officials</u>	<u>Citizens</u>
1. Chattanooga	Gordon Mellancamp	Steve Sandler	Kirk Mayes Steve Anderson	Roy Parrish Ellis Spencer	James Barnett Richard Carmack
2. Philadelphia	Tom Walton	Glen Witmer	Sedwick Harper	Robert Struble Tom Fulweiler	Barbara Paul William Martin
3. St. Louis	Larry Zensinger	Lee Duvall	Earl Holtgraeve	Kaiser Judge Steinberg	Steven Banton Suzanne Pogell
4. Houston-Galveston	Nick Aschlimann Charles Savino	Sam Nott	Dr. Peggy Glass	Judge Oscar Nelson	Ken Kramer W.W. Wright
5. Lower Rio Grande	John Janak	Martha Seymour	Dr. Peggy Glass	Bill Meyers Juanita Brodecky	William Parish Ersel Lantz
6. Martha's Vineyard	Bill Wilcox	Charles Conway	Susan Wilkes	Ronnie Schultz	Robert Woodruff Marguerite Bergstr
7. Dayton	Bert Middlebrook	Elaine Greening	Al Buoni	Ron Schmidt Gene Cronk*	Madline Lohman Chris Carolson
8. Kansas City	Tom Neal	Larry Sheridan	Ben Williamson (Kansas) Ed Knight John Schondelmeyer Joseph Fitzpatrick (Missouri)	Robert Hart James Farley	Richard Baldouf Roberta Chittendon
9. Middlesex County, New Jersey	William Krause	John Wodkowski	William Minervini	Richard Naberezny John Runyon	E.I. Rumrill Joan Ryan
10. Salem	Curt Smelzer	Cecil Oullette	Russ Fetrow	Herb Arnold Ted Lopuscynski Ellen Lowe Alan Miller	Caroline Neuwirth

*

County engineer interviewed as substitute for local Mayor who was unavailable for interview.

<u>WQM Study Area</u>	<u>WQM Project Directors</u>	<u>EPA Regional Project Officers</u>	<u>State Liaisons</u>	<u>Local Officials</u>	<u>Citizens</u>
11. Seattle	Rod Stroope	Al Ewing	Chuck Clark	Daye Mooney Brad Gillespie Donovan Treacey	Scott Smith Bob Copernoll
12. Cincinnati	Dory Montezumi	Elaine Greening	Debbie Gross-Sidlow	Jim Saunders Bob Turner	Jack Kleymeyer Joan Hammond
13. Southeastern Wisconsin	Bill McElwee Larry Wyble	Bruce Baker	Randy Wade	R.J. Borchart Norbert Dettmann Paul Vrakas	Helen Jacobs William Murphy
14. Augusta	John Forster	Ed Woo	Bill Stoddard	Robert Stubbs Scott Higgings	Janet Rizi
15. Ft. Meyers	Larry Pearson	Steve Sandler	Bill Busig	Beverly Clay Richard Hallam Robert H. Shedd	Joe Roach
16. Sussex County, Delaware	William Pleasants	Larry Maxwell	Rudolph Jass	Al Stango Byard Coulter	John Farrow Joseph Skelly
17. Teton County	Eugene Zeizel	Bruce Zanders	Larry Robinson	Paul Bruin Muffy Moore	Skip Wright-Clark
18. Ventura	Joe Borgerding Mike Williams (Assistant)	Mary Ann Grasser	Jim Haupt	Ted Grandsen L.H. Maland	Janet Beymer
19. Yellowstone-Tongue	Clark Judy	Roger Dean	Steve Pilcher	Floyd Iron Art Kamhoot	Walter Archer