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COUNCILMEMBER RON ROBERTS
City of San Diego
Memorandum

DATE: July 30, 1993

TO: City Manager Jack McGrory

FROM: Councilmember Ron Roberts

SUBJECT: Implementation of Integrated Coastal Management Response to City Manager's Memo of June 28, 1993

Thank you for your response to my memo of May 11 on the subject of Integrated Coastal Management (ICM). I continue to be very enthusiastic about the potential benefits of this management practice for controlling pollution in our waters.

I was pleased to see that you are requesting the three departments current involved in water, wastewater and stormwater management to recommend ways to improve and streamline the current organization in the spirit of ICM. However, I was concerned to see that these departments would not report on their findings until November of this year.

As you may recall, the city has promised the Coastal Commission an extensive briefing on the status of our Mission Bay pollution cleanup efforts at the commission's November meeting in San Diego. In order to give the commission an accurate overview of the city's activities, I believe the report on ICM should be available well prior to that meeting.

I would urge your staff to complete this ICM report in October so that it can be shared with the Mission Bay Committee and other interested organizations prior to the November commission meeting. I believe it would add significantly to the November briefing if the public had had a chance to review and comment on the ICM report prior to November.

In addition, because of the importance of the November meeting, I would appreciate a briefing by your staff in early October to discuss the city's presentation.

Thank you in advance for your consideration.

cc: Honorable Mayor and City Council
Honorable Supervisor Leon Williams
Commissioner Madelyn Glickfeld
Commission Alternate David Malcolm
Peter Douglas, Coastal Commission
Ellen Lirley, Coastal Commission
Helen Duffy, Mission Bay Committee
Rose Marie Starns, Mission Bay Lesses
Ralph Hicks, Port of San Diego
Gary Stephany, County Environmental Health
Joy Zedler, PERL
Scott Jenkins, Surfrider Foundation
Don Kent, Hubbs Seaworld Research
Mia Tegner, Scripps Institute
Isabel Kay, UCSD Natural Reserve System
Glenn Brandenburg, Mission Bay Aquatic Center
Laura Hunter, Environmental Health Coalition
Greig Peters, Regional Water Quality Control Board

Attachment

City of San Diego

MEMORANDUM

JUL 7 1993

DATE: June 28, 1993

TO: Honorable Mayor and City Council

FROM: City Manager

SUBJECT: Implementation of Integrated Coastal Management
Response to Councilmember Roberts' Memorandum of May 11, 1993

On April 16, 1993, the National Research Council released a report entitled "Managing Wastewater in Coastal Urban Areas." This report recommended a new approach to environmental protection in the form of "Integrated Coastal Management" (ICM). Councilmember Ron Roberts has asked a number of questions that provide a framework for establishing an implementation strategy for the San Diego region (memo attached).

In response to his request for a framework for implementation I have asked the three departments currently involved in water, wastewater, and stormwater management to recommend ways to improve and streamline the current organization in the spirit of Integrated Coastal Management. A report on their recommendations will be distributed in November 1993.

One of the ways the City is pursuing implementation of ICM is through participation with the Association of Metropolitan Sewerage Agencies (AMSA) in its legislative initiative known as the Comprehensive Watershed Management Act of 1993. The proposed Act was formulated over a period of two years and included review and discussion not only by the 150 cities that are members of AMSA, but also industrial trade organizations, environmental groups, agricultural representatives, state and federal regulatory agencies, and other groups interested in the protection of water quality. The approach outlined is similar to the one recommended in the NRC report in that it is water quality driven, regional, and enhances cooperation among organizations to effectively manage common watersheds. A summary of the key points in AMSA's bill is attached.

JACK McGRORY

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Attachment

March 1993

THE COMPREHENSIVE WATERSHED MANAGEMENT ACT OF 1993

** AN OVERVIEW **

BACKGROUND

The Clean Water Act's historic focus on technology-based standards, end-of-pipe treatment, aggressive compliance schedules and significant federal funding, has achieved enormous reductions in the pollutants discharged to our nation's waters. While this approach produced significant benefits, the future application of technology-based standards will not result in the same level of water quality improvements.

Achieving tomorrow's water quality successes will be far more challenging. Solutions will be less straight forward, funding more difficult and new players must play a role in solving problems.

As we look ahead to a reauthorized Clean Water Act, our focus must shift to a more comprehensive approach to clean water goals. Addressing the control of costly, more complex and diverse sources of pollution will require both creativity and flexibility. And attainment of water quality goals through pollution control and prevention will depend on a variety of individual decisions by local, state and federal agencies. Rising capital costs make it imperative that cost-effective alternatives for pollution control and prevention be fully analyzed and that comprehensive management strategies be established for prioritizing water quality decisions on a watershed-specific basis.

The Association of Metropolitan Sewerage Agencies (AMSA) shares with many others the vision of a new Clean Water Act. This vision begins with the preservation of our achievements of the past twenty years, proceeds with the identification of water quality and ecosystem health impairments, quantifies the point and nonpoint contributions of pollutants to major drainage systems or watersheds, and results in a comprehensive plan for each watershed -- all with the goal of moving toward the water quality improvements necessary to give us meaningful environmental benefit.

AMSA has taken on the task of crafting a federal legislative initiative, the Comprehensive Watershed Management Act of 1993, for two reasons. First and foremost, to facilitate the achievement of the goal of meaningful environmental benefits from water quality improvements and secondly, in response to requests from national policy makers to define the specific components of a comprehensive watershed management program that could be national in scope.

The vision contained in the Comprehensive Watershed Management Act of 1993 calls for the development of comprehensive watershed management plans with the participation of all levels of government, point sources, nonpoint sources, users of the watershed and citizens. Through the legislation, the reduction of pollutant loadings follows rationally from a scientific analysis of site-specific conditions and the technologies available to improve those conditions. Priorities are established based on the quality and use of receiving waters, ecosystem health, and the sources of pollutants damaging to those concerns.

AMSA believes that comprehensive watershed management planning must emphasize establishing priorities, maintaining flexibility and empowering local, regional and state government and the community to solve their unique problems. AMSA's comprehensive watershed management legislation provides:

- an institutional framework for developing watershed management strategies by creating watershed management commissions;

- a management framework for comprehensive watershed management planning by requiring a step-by-step evolution of policies, standards, requirements, plans and programs;

- a technical and scientific framework by identifying methods to evaluate, attain, monitor and maintain watershed-specific water quality objectives. This technical framework would emphasize appropriate point and nonpoint source controls and incentives, as well as financing plans to attain water quality objectives; and

- federal regulatory oversight and enforcement of locally-created comprehensive watershed management plans through the existing National Pollutant Discharge Elimination System (NPDES) program and other mechanisms.

PROCESS

In February of 1992, AMSA's Board of Directors endorsed ongoing AMSA efforts on comprehensive watershed management. The Board's commitment to developing this concept was evidenced by the formation of a Comprehensive Watershed Management Committee and an assignment to that Committee to draft legislative language to establish comprehensive watershed management on a national scale.

Since that time this effort has proceeded, supported by the participation of AMSA's membership and a wide variety of outside organizations and entities. A significant compo-

nent in the development of this legislation has been a concerted effort to not only build consensus on this issue within AMSA's membership nationally, but also to reach out to a diverse array of organizations and entities that would be affected by its passage. This effort to build coalitions and reach consensus recognizes that by vesting regional environmental planning at the local and state level, the management responsibilities fall to the people who know the problems best, who can focus attention on their resolution, and who have a stake in seeing the problem solved.

In mid-January of 1993, and again in early February, AMSA's draft legislative language was discussed at meetings of AMSA's leadership. In numerous meetings with other interested parties, comments were received from a wide variety of points of view.

PRINCIPAL TENETS

AMSA's leadership adopted the following principal tenets to guide the development of the Comprehensive Watershed Management Act of 1993:

PRINCIPAL TENETS OF THE COMPREHENSIVE WATERSHED MANAGEMENT ACT OF 1993

Adopted by AMSA's Board of Directors
February 4, 1993

1. The overall objective of comprehensive watershed management planning is to make cost-effective, site-specific decisions that achieve water quality objectives that protect the designated beneficial uses of a watershed.

2. Science must be the basis for public policy decisions.

3. All players must be at the table to equitably address future water quality objectives.

4. Local government and publicly-owned treatment works must have an active role in establishing water quality objectives for the watersheds in the which they are located.

5. Local stakeholders (government entities, sources of watershed impacts, users of the resources within the watershed, the public and others with a specific interest in how the watershed is managed) must have the clearly stated opportunity to provide recommendations and direct advice and counsel to the Governor regarding the designation of their watershed boundaries and the makeup of its Commission.

6. Progress on water quality improvement, including minimum standards of operation (MSOs), must continue as comprehensive watershed management planning moves forward. Until a watershed management plan is completed, permitting agencies that are responsible for National Pollutant Discharge Elimination System (NPDES) permits must take into account those sources within a watershed that cause water quality impairment and must accordingly exercise flexibility and discretion in exerting their regulatory authority in setting effluent limits and compliance schedules, and in conducting enforcement activities.

7. Time frames for completing a comprehensive watershed management plan must be realistic.

8. Implementation of elements of the comprehensive watershed management plan must be verified and enforced to assure equity among all sources or categories of sources of pollutants of concern in a watershed.

9. The scheduling of compliance with Clean Water Act requirements and prioritization of resources to achieve water quality objectives shall be guided by watershed plans. One expected outcome of an approved watershed management plan is that NPDES terms, conditions and limits shall be modified as appropriate to cost-effectively achieve the water quality objectives of the plan.

10. Comprehensive watershed management planning and the federal/state legislative and regulatory framework shall be compatible and fully integrated.