

EPA & NOAA CZARA FINDINGS - SEE FORESTRY, AGRICULTURE
COMMENT PERIOD - SEE BELOW
CZARA ACTION PLAN - SEE BELOW

CZARA approval notice – EPA web-site:

<https://19january2017snapshot.epa.gov/www3/region9/water/nonpoint/cal/finalapproval.html>

CZARA Conditions of Approval – EPA web-site:

<https://19january2017snapshot.epa.gov/www3/region9/water/nonpoint/cal/finaldraft.html>

CZARA Findings – EPA web-site:

<https://19january2017snapshot.epa.gov/www3/region9/water/nonpoint/cal/finding.html>

The U.S. Environmental Protection Agency (EPA) and the National Oceanic and Atmospheric Administration (NOAA) approve the coastal nonpoint pollution control program submitted by the State of California pursuant to Section 6217 (a) of the Coastal Zone Act Reauthorization Amendments of 1990 (CZARA), subject to certain conditions.

This document provides the specific findings used by NOAA and EPA as the basis for the decision to approve the State's program. It also provides the rationale for the findings and includes the conditions that have been established for California to receive final approval of its program.

NOAA and EPA have written this document as succinctly as possible. Where appropriate, NOAA and EPA have grouped categories and subcategories of management measures into a single finding. The structure of each finding follows a standard format. Generally, the finding is that the State's program includes or does not include management measures in conformity with the section 6217(g) guidance and includes or does not include enforceable policies and mechanisms to ensure implementation. In some cases, the finding reflects that the State has identified a back-up enforceable policy, but has not yet demonstrated the ability of the authority to ensure implementation. For further understanding of terms in this document, the reader is referred to the following:

Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters (EPA, January 1993)

Coastal Nonpoint Pollution Control Program: Program Development and Approval Guidance (NOAA and EPA, January 1993)

Flexibility for State Coastal Nonpoint Programs (NOAA and EPA, March 1995)

The references in this document to page numbers and text refer to the California

Coastal Nonpoint Pollution Program Submittal, September 1995, which includes the document "Initiatives in Nonpoint Source Management," ("program submittal"). We have relied upon, but do not repeat here, the extensive information that the State has included in its program submittal. Further information and analysis is contained in the administrative record for this approval decision and may be reviewed by interested parties at the following locations:

EPA Office of Wetlands, Oceans and Watersheds
Assessment & Watershed Protection Division
Nonpoint Source Control Branch
401 M Street, S.W. (4503-F)
Washington, D.C. 20460
Contact: Robert Goo (202/260-7025)

NOAA/Office of Ocean and Coastal Resource Management
Coastal Programs Division
SSMC-4, N/ORM3
1305 East West Highway
Silver Spring, MD 20910
Contact: John King (301/713-3121)

U.S. EPA, Region IX
Water Division (WTR-3)
75 Hawthorne Street
San Francisco, CA 94105
Contact: Sam Ziegler (415/744-1990)

I. BOUNDARY

FINDING: California has included the entire State as the management area within which it will implement the coastal nonpoint program. Therefore, California's boundary is sufficient to control the land and water uses that have or are reasonably expected to have a significant impact on the coastal waters of California.

RATIONALE: The State submittal indicates that California has chosen not to develop a separate program for coastal watersheds, but rather will implement a statewide nonpoint source management program that addresses the requirements of Section 6217. Thus, the 6217 management area encompasses the entire State. This is consistent with the State's approach of preparing the section 6217 program submittal as a means to update its Section 319 Nonpoint Source Program. In this manner, California can improve the effectiveness of its program statewide by addressing a wide range of nonpoint source issues, while protecting State coastal waters in compliance with section 6217. In addition, this approach accurately reflects the ecological relationships that exist for many of California's stream systems whose headwaters are far from the coast but ultimately flow to the Pacific Ocean.

II. AGRICULTURE

FINDING: California's program includes management measures in conformity with the (g) guidance and enforceable policies and mechanisms to address the management measures for large and small confined animal facilities. California's program does not include management measures in conformity with the 6217(g) guidance to address the remainder of the agricultural management measures. The State has identified a back-up enforceable authority but has not yet demonstrated the ability of the authority to ensure widespread implementation of the management measures throughout the 6217 management area.

CONDITION: Within two years, California will include in its program management measures in conformity with the 6217(g) guidance, other than for large and small confined animal facilities. Within one year, California will develop a strategy (in accordance with Section XIV, page 18) to implement the agricultural management measures throughout the 6217 management area.

RATIONALE: Sections 2560-2565 of the regulations (23 Cal.Code Reg.) implementing the Porter-Cologne Water Quality Control Act (Cal. Water Code 13000 et seq.) require all animal facilities to implement standards consistent with the confined animal facility management measures. The Regional Water Quality Control Boards (RWQCBs) can waive requirements on an industry wide basis, but the standards must be made a condition of the waiver. As noted on page 160 of the submittal, waivers of these requirements have been given routinely by some RWQCBs to dairy facilities on an industry wide basis. EPA and NOAA strongly encourage the State to implement the TAC Report recommendations regarding various activities to ensure widespread implementation of the management measures.

Regarding the other 6217 (g) agricultural management measures, California's program submittal lists the management measures set forth in the 6217(g) guidance, but it does not indicate whether California intends to implement these measures, nor does it describe any practices that would be used to implement the measures. California appears to have several authorities and programs that could be used to implement the agricultural management measures. The State identifies the Porter-Cologne Water Quality Control Act as providing back-up authority to implement the 6217(g) management measures, but the State's preferred approach as described in the submittal is to encourage voluntary implementation activities through local comprehensive watershed management efforts. California's Nonpoint Source Program utilizes a three-tiered approach to protect California's water quality: a voluntary approach (Tier 1); regulatory encouragement (Tier II); and mandatory implementation through effluent requirements and waste discharge permits (Tier III).

Other authorities which, per the State, can be used to implement management measures include Section 5650 of the Fish and Game Code, which provides

enforceable authority where "any substance or material deleterious to fish, plant life, or bird life" enters or is placed where it can enter waters of the State, and Sections 11501 et seq. of the Food and Agriculture Code, which provide for protection of the environment from pesticides, but do not specifically require implementation of the pesticide management measure. While these and other programs and authorities appear usable to help implement the management measures in some situations, the State has not presented an implementation strategy that ensures widespread implementation.

Application of the measures may best be achieved if coordinated to produce an overall system of site-appropriate practices. The Natural Resources Conservation Service's (NRCS) whole farm planning process is one important tool that could be used to apply multiple management measures within the framework of an overall system that works for the individual producer. NOAA and EPA also recommend that the State's implementation strategy integrate the recommendations of the Technical Advisory Committees for irrigated agriculture, nutrients and pesticides to implement the management measures.

III. FORESTRY

FINDING: California's program includes management measures in conformity with the 6217(g) guidance and includes enforceable policies and mechanisms for implementation. However, additional management measures are necessary in order to attain and maintain water quality standards (see Section XII, page 15).

RATIONALE: The primary authority in California to implement the management measures for forestry in conformance with the 6217 (g) guidance comes from the Z'berg-Nejedly Forest Practice Act (FPA) (Cal. Pub. Res. Code 4511 et seq.). Regulations (14 Cal. Code Reg. 895 et seq.) adopted pursuant to this law include practices in conformity with the management measures. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs) also have oversight over nonpoint discharges associated with forestry operations through the Porter-Cologne Act. The Porter-Cologne Act provides back-up authority for implementing the management measures, including waste discharge requirements, cease and desist orders, cleanup and abatement orders, civil monetary liability for specified violations, and criminal prosecutions for specified violations.

Prior to any timber harvest on non-federal lands, a Timber Harvest Plan (THP) must be prepared by a Registered Professional Forester. A multidisciplinary and interagency review is intended to be conducted for all THPs to meet the functional equivalency requirements of environmental documentation under the California Environmental Quality Act (CEQA). These activities are carried out primarily by the California Department of Forestry and Fire Protection and the Board of Forestry (CDF/BOF), as well as the RWQCBs, in accordance with the Water Quality Management Plan for Timber Operations on NonFederal Lands, and the

Management Agency Agreement (MAA), as overseen by the SWRCB.

Although California does have the basic legal and programmatic tools to implement a forestry program in conformity with Section 6217, these tools have not been fully effective in ensuring water quality standards are attained and maintained and beneficial uses are protected. California waters currently experience significant impacts from forestry. For example, silviculture is the leading source of impairment to water quality in the North Coast of California. Related to these water quality problems, California has a number of species, in particular salmon, that are endangered, threatened or otherwise seriously at risk, due in very significant part to forestry activities that impair their spawning, breeding and rearing habitat.

Section 6217 recognizes that implementation of the (g) management measures alone may not always be adequate to protect coastal waters from nonpoint sources of pollution. In these cases, Section 6217 requires the identification and implementation of additional management measures. Thus, California will need to adopt additional management measures for forestry to address coastal waters that are not attaining or maintaining applicable water quality standards or protecting beneficial uses, or that are threatened by reasonably foreseeable increases in pollutant loadings from new or expanding forestry operations. (See Section XII, page 15)

XI. CRITICAL COASTAL AREAS

FINDING: California's program does not identify and include a process for the continuing identification of critical coastal areas adjacent to impaired and threatened coastal waters.

CONDITION: Within one year, California will revise its process to provide for the identification of critical coastal areas beyond the existing coastal zone boundary and within watersheds draining into Monterey Bay.

RATIONALE: The State's program includes several of the components necessary for the identification of critical coastal areas. California reviewed existing State programs that implement sections 319(a)(1) and 303(d) of the Clean Water Act as a starting point to evaluate and identify critical coastal areas for the purposes of section 6217. The State developed a working definition of critical coastal areas to include "the coastal zone portions of watersheds which drain into impaired and threatened coastal waters". Areas meeting this definition are listed in the State's submittal.

There are two factors that preclude the State from fully meeting the critical coastal area requirements: restriction of critical coastal areas to the existing coastal zone, and exclusion of the watersheds draining into Monterey Bay. The State proposes to limit the inland extent of critical coastal areas to the existing coastal zone boundary. In some cases, the coastal zone boundary is as narrow as 100 feet inland from mean high water. Thus, the truncation of critical coastal areas at the coastal zone boundary

may not provide adequately for the implementation of additional measures needed to protect against current and anticipated nonpoint source problems.

The State also proposes to exclude watersheds draining into Monterey Bay from consideration as critical coastal areas. As discussed in the Program Development and Approval Guidance, States are encouraged to include previously designated areas, such as Marine Sanctuaries, as critical coastal areas. NOAA and EPA are involved in a joint effort with the State to develop a water quality plan for the Monterey Bay National Marine Sanctuary (MBNMS), however, the water quality plan has not been completed. When completed, the State may be able to use the MBNMS water quality plan as a mechanism to apply additional management measures to critical coastal areas within watersheds draining to Monterey Bay.

----- REQUEST FOR COMMENT-----

DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

THE ENVIRONMENTAL PROTECTION AGENCY
Coastal Nonpoint Pollution Control Program: Proposed Findings Document,
Environmental Assessment, and Finding of No Significant Impact.

AGENCY: National Oceanic and Atmospheric Administration, U.S. Department of
Commerce, and The U.S. Environmental Protection Agency.

ACTION: Notice of Availability of Proposed Findings Document, Environmental
Assessment, and Finding of No Significant Impact on Approval of Coastal Nonpoint
Pollution Control Programs for California.

SUMMARY: Notice is hereby given of the availability of the Proposed Findings Document, Environmental Assessment (EA), and Finding of No Significant Impact for California. Coastal states and territories were required to submit their coastal nonpoint programs to the National Oceanic and Atmospheric Administration (NOAA) and the U.S. Environmental Protection Agency (EPA) for approval in July 1995. The Findings document was prepared by NOAA and EPA to provide the rationale for the agencies' decision to approve the state coastal nonpoint pollution control program. Section 6217 of the Coastal Zone Act Reauthorization Amendments (CZARA), 16 U.S.C. section 1455b, requires states and territories with coastal zone management programs that have received approval under section 306 of the Coastal Zone Management Act to develop and implement coastal nonpoint pollution control programs. The EA was prepared by NOAA, pursuant to the National Environmental Policy Act (NEPA), 42 U.S.C. sections 4321 et seq., to assess the environmental impacts associated with the approval of the coastal nonpoint pollution control

program submitted to NOAA and EPA by California.

NOAA and EPA have proposed to approve, with conditions, the coastal nonpoint pollution control program submitted by California. The requirements of 40 CFR Parts 1500-1508 (Council on Environmental Quality (CEQ) regulations to implement the National Environmental Policy Act) apply to the preparation of the Environmental Assessment. Specifically, 40 CFR section 1506.6 requires agencies to provide public notice of the availability of environmental documents. This notice is part of NOAA's action to comply with this requirement.

SUPPLEMENTARY INFORMATION

Introduction

Nonpoint source pollution, pollution caused by a wide range of activities including agriculture, urban development and forestry, is a major cause of water quality impairment nationally and in California. To address these problems, the State of California, along with various federal and local agencies, private non-profit groups and landowners are involved in many efforts to reduce and prevent nonpoint source pollution. California's CZARA Program submittal is an important part of these efforts. However, the proposed findings for the California submittal conclude that the program as currently submitted to EPA and NOAA is not adequate to protect California's water quality. In particular, EPA and NOAA are asking the State Water Resources Control Board (SWRCB) and the California Coastal Commission (CCC) to more fully identify the activities that will be undertaken to ensure implementation of management measures for the major nonpoint sources in the State, while providing for evaluation, feedback, public review and program adjustments as necessary. California has agreed (as described in California CZARA Action Plan dated August 25, 1997) to expand upon the California submittal documents prepared to date to more fully address the requirements of CZARA and advance the success of the nonpoint source program.

Background: Description of California's Nonpoint Source Program

The SWRCB and the nine Regional Water Quality Control Boards (RWQCBs) have primary responsibility in California for the protection of water quality. As such, in 1988 the SWRCB adopted the California Nonpoint Source (NPS) Management Plan that outlined a 3-tiered management approach for addressing polluted runoff: (1) voluntary implementation of Best Management Practices (BMPs), (2) regulatory-based encouragement of BMPs, and (3) effluent limitations. In addition to the SWRCB and the RWQCBs, California's program recognizes that other federal, state, local and non-governmental entities have key responsibilities for addressing the problems caused by nonpoint sources, such as the Board of Forestry, Department of Pesticides, California Department of Transportation, Natural Resource Conservation Service, Bureau of Land Management, local governments, Resource Conservation

Districts and private landowners. Preparation of the State's NPS Management Plan was in response to the Clean Water Act Section 319, enacted by Congress in 1987. CWA Section 319 required states to develop an assessment report detailing the extent of nonpoint source pollution and a management program specifying nonpoint source controls, in order to be eligible for federal funding. As a result, California receives an annual federal funding allocation under Section 319 of the Clean Water Act. In 1997, California received \$5.5 million to carry out its nonpoint source program.

California's Response to Section 6217 of CZARA

CZARA requirements resulted in the expansion of the partnership for addressing nonpoint source pollution to include the California Coastal Commission (CCC), in order to strengthen the links between Federal and State coastal zone management and water quality programs. Therefore, the SWRCB, the RWQCBs and CCC undertook a joint effort to both improve the statewide nonpoint source program and comply with CZARA requirements. In February 1994, the State initiated a comprehensive review process to consider the requirements of Section 6217 and update its existing statewide nonpoint source management program rather than create a separate program dealing exclusively with coastal waters. The State anticipated that a statewide approach would reduce resource expenditures and eliminate the potential for regulatory inequities which might occur if a separate nonpoint source pollution control program was instituted for coastal areas.

The State convened technical advisory committees (TACs), composed of representatives from industry, academia, environmental groups, and state and federal agencies, to provide critical input to the program review. For one year the TAC's reviewed current nonpoint source programs and developed consensus-based recommendations for improving implementation, including innovative approaches for using existing programs more efficiently, and allowing limited staff and fiscal resources to be focused on the most pressing water quality problems. The 10 separate technical advisory committee (TAC) reports identified a wide range of activities aimed at implementing the CZARA management measures, improving the State's nonpoint source program, and reducing the water quality impacts associated with nonpoint source pollution. In addition these reports generally reflected several common themes, including the need to: improve outreach and technical assistance to individuals and local groups; support local stewardship and specific, problem-responsive measures devised through comprehensive watershed management plans; better coordinate activities of the various resource management agencies. In addition, the reports indicated a preference for voluntary cooperation over prescriptive measures. However, where voluntary efforts have not succeeded and significant water quality problems persist, the reports indicated that appropriate authorities to achieve environmental improvements should be utilized.

The SWRCB and the CCC then prepared the State of California's response to

CZARA and submitted the documents in September 1995 to EPA and NOAA, as required by the statute. The State's submittal package included two principal documents:

"California's Coastal Nonpoint Pollution Control Submittal," which is an account of the State's existing programs related to the management of nonpoint pollution, and

"Initiatives in Nonpoint Source Management," which describes several Initiatives adopted by the SWRCB to improve the nonpoint source program, along with the associated TAC reports.

EPA and NOAA's Review of California's 6217 Submittal

The proposed findings document now available for public review concludes that the State's submittal has some significant gaps that will require improvements to conform with the requirements of CZARA and more effectively address nonpoint source pollution. While California's nonpoint source program as described in the submittal is encouraging because of its broad scope in terms of the State's authorities and programs to address nonpoint source pollution, its statewide applicability and the watershed approach being proposed, the submittal is not sufficient because (in summary):

The submittal does not describe how the management measures are incorporated into the State's program and how they will be implemented;

The submittal does not describe how existing "back-up" authorities will be used to ensure implementation of the management measures, if voluntary efforts fail;

The submittal does not adequately address key gaps and recommendations identified by the Technical Advisory Committees to help implement the program effectively;

The submittal does not incorporate the activities, roles and responsibilities of the CCC;

The submittal does not adequately address common program elements related to administrative coordination, technical assistance, critical coastal areas, additional management measures and monitoring.

EPA and NOAA have reached agreement with the CCC and the SWRCB on an "action plan" for improving California's Nonpoint Source Program that will also assist the State in meeting the requirements of Section 6217 of CZARA. The "action plan" outlines a framework and key activities that the CCC and the SWRCB along with the RWQCBs will undertake to prepare an implementation strategy to improve efforts to

reduce nonpoint source pollution. EPA and NOAA anticipate that the completion of the activities in the "action plan" will address the submittal's current shortcomings in a manner that will provide California with a more effective nonpoint source program and help meet the conditions for program approval identified in the proposed findings. EPA and NOAA are encouraging the State to base this strategy, to the fullest extent possible, on the CZARA materials submitted to date and to continue to involve a wide range of stakeholders in preparing and implementing a nonpoint source program that more fully protects California's water quality and complies with CZARA.

Copies of the Proposed Findings Document, Environmental Assessment, and Finding of No Significant Impact may be obtained upon request from: Joseph P. Flanagan, Coastal Programs Division (N/ORM3), Office of Ocean and Coastal Resource Management, NOS, NOAA, 1305 East-West Highway, Silver Spring, Maryland, 20910, tel. (301) 713-3121, x201.

DATES: Individuals or organizations wishing to submit comments on the proposed Findings or Environmental Assessment should do so by January , 1998.

ADDRESSES: Comments should be made to: Joseph A. Uravitch, Coastal Programs Division (N/ORM3), Office of Ocean and Coastal Resource Management, NOS, NOAA, 1305 East-West Highway, Silver Spring, Maryland, 20910, tel. (301) 713-3155, x195. (Federal Domestic Assistance Catalog 11.419 Coastal Zone Management Program Administration)

Nancy Foster, Ph.D.

Robert H. Wayland, III Assistant Administrator for Director, Office of Ocean Services and Coastal Wetlands, Oceans and Zone Management, National Watersheds, Environmental Oceanic and Atmospheric Protection Agency Administration

-----CZARA ACTION PLAN-----

California CZARA "Action Plan"

Prepared by the SWRCB, CCC, EPA HQ, NOAA, EPA Region 9
8/25/97

This "action plan" outlines a framework and activities to achieve an approvable program under CZARA §6217, while improving California's Nonpoint Source Program.

1) Management Measures and Authorities

The SWRCB and CCC will review management measures in consultation with other state and local agencies and develop a Management Measure Review document

within 8 months (3/98). The document will include:

- identification of management measures
- identification of authorities that implement the management measures
- identification of who will implement the management measures (e.g., lead agency)
- existing programs/strategies/implementation plans
- existing BMP's and BMP guidance

A. When meeting with other agencies, SWRCB/CCC will look for opportunities to link management measures with existing authorities and programs.

B. The SWRCB and CCC will identify gaps in existing management measures/authorities/programs and strategies for follow-up.

C. The SWRCB and CCC may propose alternative management measures, as necessary. If proposing alternatives, the State will:

- provide justification on why alternative is necessary
- explain how the alternative management measure will be equally or more effective than the g-guidance measure

D. With respect to counties and municipalities, the SWRCB and CCC will focus on State authorities (e.g., the CEQA Guidance checklists, General Plan guidelines, Subdivision Map Act, and CCC's Local Coastal Program guidance).

E. The SWRCB and CCC will adapt and refine CCC manual for polluted run-off as a tool to work with other agencies.

2. Implementation Strategy

SWRCB/CCC/EPA/NOAA agree that the program goal will be to implement management measures (except exclusions), including additional management measures where necessary, within 15 years.

It is anticipated that incremental implementation of the management measures will occur through "prioritization" and "targeting" by the SWRCB, CCC and RWQCBs, that may be based on:

- coastal waters focus
- 303(d) listed waters
- sectors (e.g. agriculture, urban, etc.)
- management measures
- opportunities to build off of existing programs

The SWRCB and CCC will prepare, by 12/98, a 15-year Implementation Strategy that generally describes how the overall program will be incrementally implemented. The 15-year Strategy will address statewide implementation of the Nonpoint Source Program in a manner that complies with CZARA §6217.

The SWRCB and CCC will also prepare more detailed 5-year Action Strategies. The first 5-year Action Strategy, will also be prepared by 12/98 (see below for relationship to WMI). The 5-year Action Strategy will address the first-tier of priorities, consistent with the 15-year Implementation Strategy.

The Management Measure Review will feed into development of both the 15-year and 5-year Strategies, which will be substantive and succinct documents. To the extent feasible, the 15-year Implementation Strategy will address the 9 key elements as expressed in the EPA NPS Program and Grants Guidance of 1997 and Future Years. EPA agrees that the 15-year Implementation Strategy can serve as California's NPS Management Plan update, if all 9-key elements are addressed. The SWRCB agrees to explore by 3/98 potential policy and legal issues concerning whether or not a formal update to the NPS Management Plan would be necessary.

In addition to the common program elements (see below for discussion of common elements), the following elements will be included in both the 15-year Implementation Strategy and 5-year Action Strategies, with general descriptions in the 15-year Strategy and detailed descriptions in the 5-year Strategies: goals, respective roles of all agencies, priorities, activities, milestones that can be measured and evaluated, review and evaluation including public input. These elements can be based to the fullest extent possible on California's existing CZARA Submittal, including the "Initiatives in NPS Management" document and the reports of the Technical Advisory Committees, as well as the "Description of the implementation process and authorities" on pages 20-21 of NOAA/EPA's Program Development and Approval Guidance Document (January 1993).

3. Relationship of CZARA and the Watershed Management Initiative (WMI)

A. By 10/97, EPA/SWRCB/RBs will provide instructions for chapter preparation regarding NPS activities. Instructions will anticipate CZARA management measures for next year, but won't ask the RB's to go by management measures for this year. 1997 guidance may address: sectors, watersheds, technical transfer, education, and implementation of 3-tiered approach in the NPS Management Plan. The SWRCB will convene a meeting with the Coastal RB's and the CCC, in Fall 1997.

B. For 1998, revised NPS instructions will be prepared for the annual update of the WMI chapters based on the Management Measures Review document and draft Implementation Strategy.

C. The 1998 WMI Chapters will be a key component of the first 5-year Action

Strategy.

4. Common Program Elements

Technical Assistance: CCC/SWRCB will identify technical assistance activities that build off of the "Initiatives in NPS" document. They will be tied to the management measures and additional management measures, and will be included as a component of implementation strategies. They may, for example, be for each program or technical teams for watersheds. It should also address the gap that has been identified for hydromodification.

Critical Coastal Areas: CCC/SWRCB will describe identification process for critical coastal areas which can be based on the TMDL-303(d) process. Evaluate potential role for CCC in TMDL development and implementation and consider the protection of pristine areas that may be threaten by anticipated land use changes. Link with existing programs (i.e., sanctuaries).

Additional Management Measures: CCC/SWRCB will develop a process to identify need for additional management measures. May be good to tie to review and evaluation process. Consider treatment of abandoned mines in terms of additional management measure process. Address forestry as per conditions pertaining to need for additional management measures.

Administrative Coordination: CCC/SWRCB will identify mechanisms to coordinate relevant Federal, state and local program through interagency committees, memorandum of agreement or other mechanisms. This work will also address coordination of CCC, SWRCB, RB's, EPA and NOAA activities.

Monitoring: SWRCB/CCC will examine monitoring ongoing throughout state (e.g., Morro Bay NPS National Monitoring Project) to evaluate effectiveness of management measures to reduce loads and improve water quality. SWRCB/CCC will establish a process to monitor implementation of the management measures. Improve 305(b) reporting as it pertains to NPS.

Program Review & Evaluation: Measurable milestones in five year action strategy will be basis for program evaluation. NOAA/EPA/State will continue discussion on how to undertake combined programmatic review with public participation. The 15-year Implementation Strategy will reflect this process by 12/98.

Pubic Participation: Opportunities for public participation will be provided for in implementing the program.

Send questions and comments to: ziegler.sam@epamail.epa.gov
Region 9 Office: 75 Hawthorne Street, San Francisco, California, 94105