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Advocacy Position Statement

Watershed Approach to Water Quality with All Key Stakeholders

Statement of Purpose

The American Public Works Association (APWA) seeks to inform elected officials, regulators, policy-makers and decision-makers and the public at-large of its stated position on the Watershed Approach to Water Quality with all Key Stakeholders.

Statement of Position

The American Public Works Association (APWA) supports a holistic watershed approach to water resources management – where all key stakeholders, including agricultural, commercial, industrial, recreational and municipal service providers, do their proportionate share to prevent and reduce impacts in their common watershed – as an effective and comprehensive means of meeting the goals of preserving the quality of the nation’s waters.

The goal of a watershed approach is to manage to the “triple bottom line” defined as, environmentally sustainable, economically feasible and enhances the quality of life.

Background and Rationale

Many organizations and agencies favor a “watershed approach.” The difficulty lies in outlining a fair and responsive process for these groups to operate in a complex array of apparently unrelated local, state and federal laws and regulations. States and the U. S. Environmental Protection Agency (USEPA) are working on an aggressive, often court-imposed, schedule to develop and adopt numeric limits known as “Total Maximum Daily Loads” (TMDLs) for selected waterbodies. There is concern that they may be leaving out the very local governments who will later be “expected” to implement the desired controls.

Under the Safe Drinking Water Act, new requirements for source water assessment and protection have been adopted. They will require close coordination between water utilities, who supply drinking water, and local governments in the reservoir drainage areas or aquifer recharge areas, many of whom may not be customers of that utility. Stormwater “Phase II” rules from the USEPA have expanded coverage of the stormwater permit program to all urbanized areas of the nation. There is much opportunity through the National Pollutant Discharge Elimination System (NPDES) stormwater program to develop effective, cost efficient programs on a watershed basis.

A watershed approach would serve as the “holistic” vehicle to join the various programs within the Clean Water Act itself, such as combined sewer overflows, sanitary sewer overflows, stormwater, traditional NPDES permitting and TMDL’s among others. It would also bring together the parties who have been operating under disparate voluntary and regulatory programs. Most importantly, it would allow a process to achieve meaningful results for the large sum of public money being expended on water quality issues.

Environmental and climatic conditions in this country vary significantly, from tropical forests to arid desert lands. The watershed approach encourages regional, geographic and climate specific solutions to environmental problems as well as attention to regionally and locally-determined pollutants of concern. The watershed approach also encourages monitoring and research within watersheds to determine site-specific water resource issues and to provide the basis for designing solutions tailored to climatic conditions and geographies. Its site-specific nature encourages local governments to develop solutions consistent with their needs, capabilities, and concerns.

Historically the Clean Water Act has focused on addressing point sources of pollution. Federal regulations and funding have led to enormous reductions in the pollutants discharged into our waterways from point sources. Today, water quality is most significantly impacted by nonpoint sources of pollution, including agriculture and urban runoff. A comprehensive means of improving water quality conditions requires an approach that addresses all pollution sources on a common watershed basis.

The watershed approach calls on key stakeholders -- whether it be the federal government, state and local governments, business and industry, agriculture or the public-at-large -- to contribute to the watershed process by setting and promoting goals, identifying and understanding problems, selecting priorities, implementing solutions, and evaluating results. Broad-based involvement makes watershed programs more cost-effective, limits duplications of effort, gains stakeholder support, increases efficiency in meeting water quality goals, promotes public awareness, and achieves political support.

Guiding Principles

APWA believes that an effective watershed approach addresses problem prevention in addition to problem solution and must be guided by the following principles:

Involvement of Key Stakeholders – key stakeholders in a watershed are identified early in the planning process and are provided an opportunity to participate meaningfully. Failure to do so undermines the process, as well as the results at the conclusion of the process.

Watershed Based Permitting – the goals identified in managing our watersheds to the triple bottom cannot be achieved without restructuring at the federal level to allow for watershed based permitting.

Pollution Prevention at the Source – the best management practice is to recognize and prevent a potential source of pollution before it occurs. Prevention is more cost-effective in the long run than cleanup or treatment, and it should be emphasized first in any common watershed approach.

Proportionate Share – all sources of pollution in a watershed should do their proportional share to reduce or eliminate pollution. Local governments should not be forced by regulatory authorities to clean up more than they contribute.

Local Land-Use Decision Making – land use management is a tool that local communities may use to address watershed concerns. However, if the stakeholder effort fails to bring consensus, regulatory authorities should not be granted the authority to make land-use decisions for the local community. Land-use decisions must remain local.

Streamlining Regulatory Processes and Redirecting Resources – Comprehensive watershed management can be accomplished by reexamining regulatory priorities, streamlining regulatory processes, and redirecting federal, state and local resources. The watershed approach should not be another layer of bureaucracy, but a true alternative to the current regulatory approach.

Incentives for Participation – a watershed approach has a greater chance of success if real incentives are provided to the key stakeholders for their participation. These could include a commitment of additional time to achieve water quality standards, streamlining permit processes, pollutant trading, priority consideration for Clean Water Act grants, or prioritization of available agricultural conservation funds within the watershed.

Coordinated Activities Over Time -- the watershed approach encourages a management cycle to lay out long-term plans for assessing, maintaining, restoring and protecting water resources. This cycle supports sustainable, cost-effective and affordable projects, with long-term continuity in program planning, execution, enforcement, and evaluation of results.

Sponsor

Water Resources Management Committee