"AN APPRAISAL OF THE 208 WATER QUALITY PROGRAM
AND OTHER PLANNING EFFORTS BY THE
OGDEN CITY-WEBER COUNTY (UTAH) PLANNING COMMISSION"

by

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APPROVAL BY INTERNSHIP REPORT DIRECTOR

This internship report has been approved on the date shown below.

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ABSTRACT

As an intern planner for the Ogden City-Weber County Planning Commission, a COG planning body comprised of staff representing both Ogden City and Weber County, my principle duty was to update county land-use data and apply it to a master land-use map representing the entire county. This map was then to be used in land-use projections by local administrators of the Federal 208 Water Quality Program.

The first section of this paper examines the background of this planning body, its role, and the direction it is providing the people and programs under its administration. This is followed by an analysis and review of present planning techniques that tend to discourage credible and responsible planning decisions on the part of the agency. The paper will conclude with recommendations and conclusions pertaining to this agency, its problems, and possible future courses of action.

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A-I INTRODUCTION

During the summer months of 1975, I was hired as an intern planner by the Weber County-Ogden City (Utah) Planning Commission. My duties were to be centered around the initial land-use inventory and projections required by the 208 Water Quality Program.

To give a background on the 208 Program, as far as this area is concerned, detail should be given to the programs leading up to the inception of the 208 Program itself. In 1972, Federal funds became available for various geographical areas to begin water quality planning. This money was first provided in small amounts through the Environmental Protection Agency, (EPA). In 1972, this funding provided the motivation for the now completed Weber Basin Study which served as a foundation or building block to the 208 Program itself. As Federal planning funding priorities became clearer throughout 1973, the scope was retailored to fulfill Utah State 303(e) Basin Planning requirements. In June, 1974, funding constraints required the program to be redefined. The final scope included:

a. Continued water quality sampling.

b. Analysis, interpretation, and presentation of water quality data.

c. Prediction and assessment of future water quality in the basin.

d. Determination of present and future water quality in the basin.

e. Presentation of economic and demographic forecast results.

f. Presentation of permit program information.

g. Analysis, interpretation, and presentation of biological sampling program results.

In April, 1975, formal funding was granted by EPA, and the move to hire various planners was on. As indicated, when I was hired in June, 1975, my primary duties were to work with the already hired CETA employees in documenting existing and prepared future land-uses. This initial step is illustrated in Appendix A. When I left in August, 1975, these primary tasks were completed and the program was continuing on to its expected completion sometime in 1977. When completed in 1977, this plan is supposed to be implemented as a supplement to determine future growth patterns for the area. It is to be a basic consideration to, hopefully, insure future continuing water quality for the expanding population for many years to come.

A-II Geographical Information

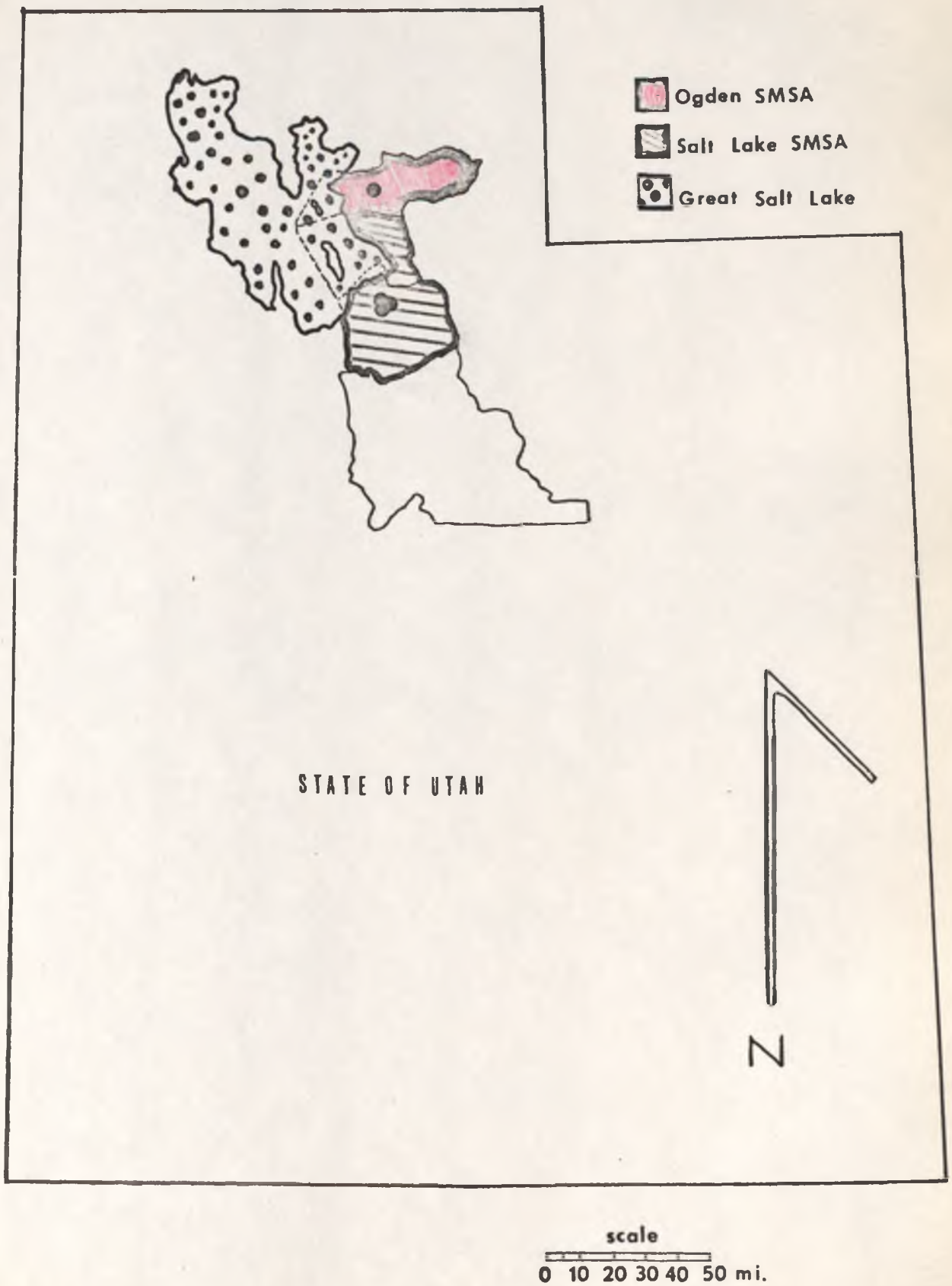
The 208 Program study-area includes Davis, Morgan, Summit, and Weber Counties, which are in the Weber Hydrolic Basin proper. Davis County, although not in the basin proper, was included in the study-area because the Weber River is its primary water supply. (See maps 1A and 2A.)

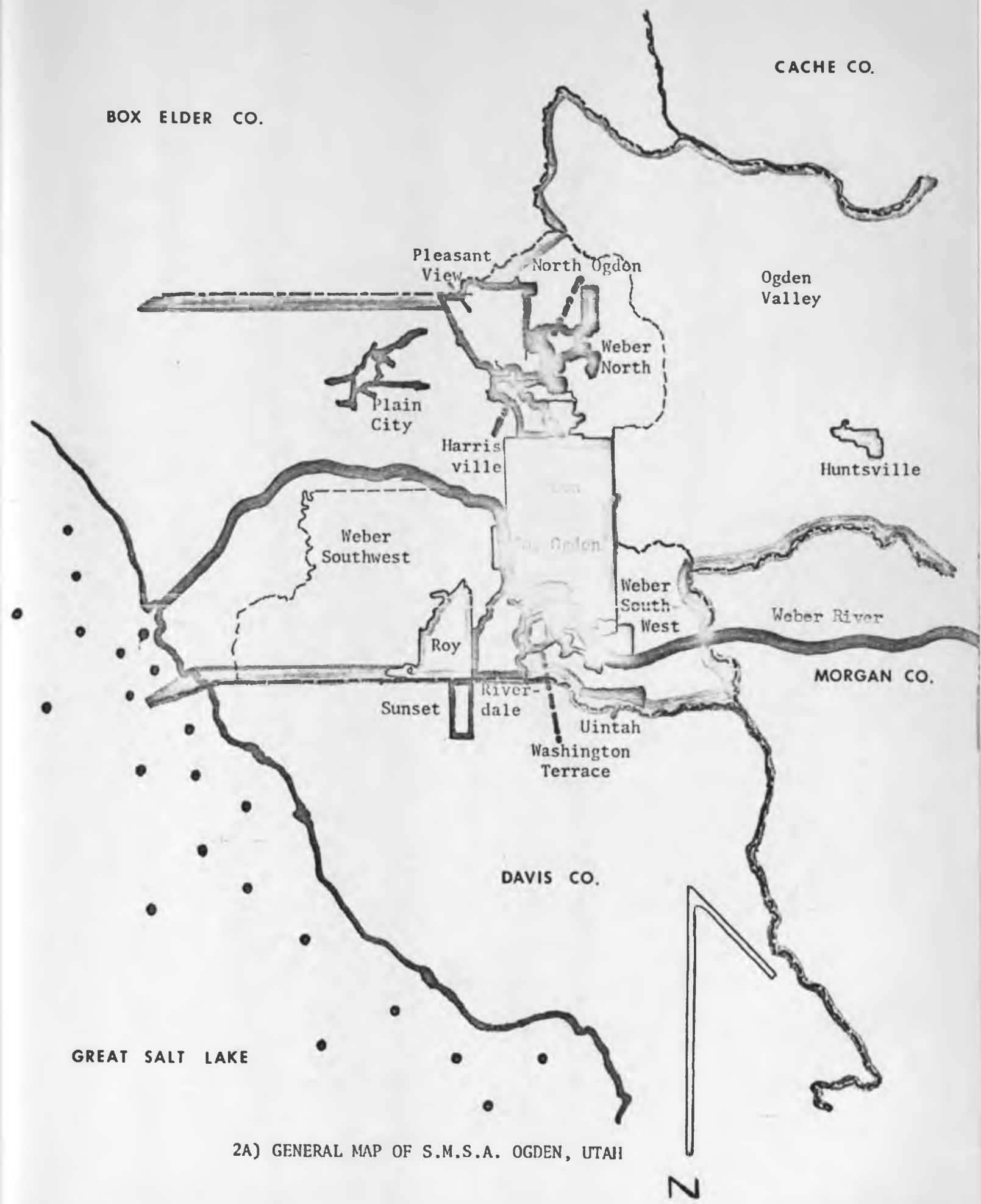
The Weber Basin, drained by the Weber River and its tributaries, covers over 2,700 square miles. The area extends eastward to the Great Salt Lake across a wide alluvial plain to the rugged Wasatch Mountains, then southeastward across several high mountain valleys to the western terminus of the Uinta Mountains.

This area includes a substantial section of the most highly developed part of Utah that is commonly known as the Wasatch Front. Population of the area was about 215,000 in 1970 of which about 70,000 reside in the City of Ogden. Ogden, the second largest city in Utah, is the focal point for most urban activity of the Weber River Basin and is located at the confluence of the Weber and Ogden Rivers.

Topography of the area varies from rugged mountain slopes, narrow canyons, and mountain valleys to bench and delta lands. The rugged Wasatch Mountains rise abruptly from the valley floor and extend in a nearly north-south direction separating the flat valley land to the west from the rolling hills and mountains in

1A) LOCATION OF OGDEN, UTAH S.M.S.A.





2A) GENERAL MAP OF S.M.S.A. OGDEN, UTAH

the interior of the Weber Basin. The southeast corner of the area merges with the high mountain peaks marking the beginning of the Uinta Mountains and divides the surface drainage into the Bear River, Weber River, Provo River, and Duchesne River systems.

The elevation ranges from about 12,000 feet near the Weber River headwaters to about 4,200 feet above mean sea level where the Weber River discharges into the Great Salt Lake. The stream gradient over the 135 mile long main stem ranges from 500 feet per mile in the upper reaches, to an average of less than three feet per mile through its final 30 mile reach across the bench land, the delta area of the Wasatch Front.

The major tributaries to the Weber River are Beaver Creek, Chalk Creek, Lost Creek, East Canyon Creek, and Ogden River. Ogden River is the largest tributary, originating in the Wasatch Mountains east of Ogden and is formed by the junction of three forks of the Ogden River at Pineview Reservoir. Below the reservoir the river flows in a narrow canyon, emerging near the City of Ogden. The Ogden River flows through the City of Ogden and joins the Weber River near the western limits of the city 17 river miles upstream from the Great Salt Lake. The other principle tributaries to the Weber River are steep canyon streams which contribute to flood runoff but which have only small sustained flows during most of the year.

The flood plain of the Weber River system comprises an estimated 42,300 acres. Of the total area subject to flooding, 1,400 acres contain residential, business, industrial, and manufacturing improvements, railroads and railroad yards, irrigation structures, utilities, and public property all located in the City of Ogden; and 100 acres consisting of residential, business, utility, and public property all located in the town of Morgan. Outside the urban areas of the basin, about 19,800 acres containing farm residences and improvements, cultivated and non-cultivated agricultural lands, irrigation structures, utilities, manufacturing plants, railroads, and highways all located within the rural flood plain of the Weber River system. An additional area of about 21,000 acres of pastureland, most of which contains heavily concentrated salts, is located within the floodplain along the lower reaches of Weber River adjacent to the Great Salt Lake.

A-III POLITICAL INFORMATION

Weber County, as in other counties throughout the United States, is a late comer as far as futuristic planning is concerned.

The Ogden City-Weber County Planning Commission is a COG primarily dependent upon Federal programs as its financial mainstay with little interest in planning as such, unless it involves the all important Federal "carrot" or dollar to provide motivation. The government form in this county is a body of three, four year term, elected county commissioners with all responsibility delegated downward. The local planning director in this case answers directly to the county commissioners. As a matter of convenience to Ogden City, the planning commission staff is contracted to Ogden City, by Weber County. This dual responsibility to both Ogden City and Weber County creates some very unusual situations involving considerable conflicts of interest as explained later.

A-IV THE LOCAL PLANNING PROCESS

As evidenced by the previous descriptions, the Weber County area does, indeed, have great potential for continued growth; however, steps need to be taken now to insure that the growth is guided toward proper channels to insure continued good water supplies and other resources required for a good quality of life.

Weber County, itself, has a population of approximately 160,000 people. Ogden is the largest city, population 70,000, with several small towns immediately surrounding. The combined Ogden City-Weber County COG staff of 13 does the entire planning job for not only Ogden City and Weber County, but also other small towns within the county boundaries. (See 2a). As imagined, the staff is hard pressed for formulating constructive planning programs as their time is primarily taken for zoning administration of these various areas, to say nothing of the numerous City Council meetings, town meetings, etc., they must attend. One can now see that the planning director, in charge of the multi-personality staff could and inactuality does, command much influence in this area. As a result, his influence is saturated into many non-planning efforts throughout the entire county. The current director of this COG has been in this position since 1956, perhaps, due to his ability to appease

the county commissioners with many political favors. As a partial result of these favors, the county commissioners manage to get elected every four years, and the process of political feather-bedding goes on. As it stands now, the planning process, the political climate, and other key democratic requirements are at a very stagnant point in Weber County.

In order to preserve a firm grasp on the situation, the planning director, in this case, must name himself as administrator of all programs, Federal and otherwise, such as the 701 Programs, the 208 Water Quality Program, the Wasatch Front COG directorship (Davis and Weber County combined), etc. As a result of these many positions, the director is seldom available to provide vital administrative capacity to his non-professional staff.

This practice results in a very poor morale problem on the part of the untrained staff as no one is there to answer questions and to provide leadership. Turnover is very high in this office, possibly encouraged by the low pay and poor conditions. (See 3a.) Therefore, the staff does not acquire time and experience, which results in the inability of any staff member to assume leadership in the absence of the director, effectively insuring the director's job. Due to this high turnover and lack of experience, a capable understudy never becomes prepared or groomed for the director's position.

Assignment Of Planner Questioned

A county commissioner wants to know why the position of assistant planning director has not been filled since it was placed on the merit system rolls a year ago.

Commissioner Bruce Jenkins said as far as he knows there is ample money in the planning bugdet to promote and fill the assistant director's job.

Ronald Kapalka, an associate planner, announced his resignation two weeks ago, saying he had accepted a position with the State of Wyoming Department of Economic Development at $2,000 more than his $12,428 annual pay with Weber County.

GOOD PEOPLE

"We hate to lose good people," Mr. Jenkins said.

Commission Chairman Boyd K. Storey has agreed to discuss with Director Graham F. Shirra the possibility of filling the assistant director's job.

Charles R. Bowen, a senior planner, plays a major role in Ogden City planning matters, and, according to Mr. Jenkins, has offers at more pay in his field elsewhere.

Ogden City contracts with the county for planning services and direction.

Under the merit system, the position of assistant planning director pays $21,507 annually. The planning director is paid $24,335. Mr. Bowen makes $17,358.

"There is too much discrepancy between Mr. Shirra's and Mr. Bowen's salary," Mr. Jenkins said.

Duties of County Planning

Assistant planner Douglas L. Wheelwright will take over duties formerly performed for the County Planning Commission by Ronald Kapalka, who resigned to take another position.

He will also assume the responsibilities Mr. Kapalka had on the Wasatch Front Regional Council regional land use restraints and capabilities studies, according to a work program prepared by Planning Director Graham F. Shirra.

Another role in which Mr. Wheelwright will figure is the housing conditions and needs study for the WFRC.

Senior Planner Charles Bowen will assume 1 per cent of the share of work in current county planning, according to the program.

STAFF SUPPORT

This includes staff support to the planning commission and the Board of Adjustment, the trails and natural resources committees.

Along with taking over new duties, Mr. Wheelwight, of 449 5th, will be withdrawn from his previous role in subdivision processing and land use update for the Ogden Area Transportation Study under the WFRC contracts for 1976 and 1977.

Mr. Wheelwright attended his first session of the planning commission in his new role.

As part of the 1976 work program, the planning department will delete development of a master street plan for Roy City.

Mr. Shirra will spend less time on the Weber Area Council of Governments. The secretary working with the council, Denys Voorhees, has resigned and a replacement is being sought.

Edward Reed will handle the OATS land use update which Mr. Wheelwright formerly took care of, as well as the land use program for Fiscal Year 1977.

Land use planning for the 208 Water Quality program, will be reduced in scope and duties divided among Mr. Bowen, Robert Long and David Houston.

LESS TIME

Robert Eldard and Mr. Bowen will spend less time on Ogden City current planning and more on 701 projects.

Edward Zendzian, who was hired under the Comprehensive Employment Training Program (CETA), will be utilized for as long as possible on current planning support and on 701 study support.

Robert Bush will taken off Ogden City planning and replaced by Mr. Zendzian.

Mr. Reed and Mr. Bush will continue to work on land use permits and Mr. Reed will continue with his share of wor on zoning petition processing fo the County Planning Com mission.

Mr. Long will take over Mr Wheelwright's share of th workload on subdivisio processing for the county.

MAPPING UPDATE

Assuming all of the mappin update, now being handled b Mr. Bush and Mr. Reed, will b Mr. Bush, who will handle th entire program.

Whether this practice is intentional or not is speculative.

A description of the planning staff is now presented so as to describe the capactiy and potential for future planning for the area. As of August, 1975, not one person on the staff had formal education in planning. Of the staff, five had college degrees, of which all were bachelor's degrees; two in geography, one in business administration, one in sociology, and one in landscape architecture. I was advised that the director, age 53, did not have any formal planning education with the exception of a two-year traffic management certificate from an Australian college.

As described elsewhere in this report, my actual work assignment centered around tasks outlined by the Weber County-Ogden City Planning Commission and their input to the 208 Program. This agency is one of four counties of an area COG concerned with 208 planning for this particular section or region of Utah. The other counties providing input are; Davis, Morgan, and Summit. Weber County contains the largest population, Davis County the second largest, and Morgan and Summit have only token representation due to small populations. This COG's makeup satisifies Federal stipulations for a 208 COG since the four counties all contain sections of the Weber River Basin proper. Since Weber County has so called organized planning as such and the other three counties do not, its agency is considered

the focal point in terms of activities and funding. Morgan and Summit Counties each have one appointed representative to this COG, while Davis County has two. Because of its stature, Weber County, therefore, calls the "shots" as far as this area as a whole is concerned with 208 Planning. This formal body meets approximately once a month in Ogden to conduct planning matters with the Weber County Planning Director once again acting as this COG's Director. It is relatively safe to say that Weber County's needs and desires prevail throughout most of the activities conducted by this COG. In spite of this arrangement, this COG satisifies the state's clearing house requirements for 208 Planning and, therefore, is funded by EPA money.

The above description presents one of the proper so called format Planning "Organizations" required by the EPA. The question must now be posed as to whether or not this situation is entirely fair to the smaller counties (in population only) as far as their future best interests are concerned. I maintain that it is not. This particular COG might as well be named the "Weber County 208 Planning Agency" because in reality that is exactly what it is. When important matters do crop up, they are simply rubberstamped with Weber County's interest at heart. I speculate that the purpose and intent of the 208 Program is not in keeping with what is occuring in this area. However, until a better "mousetrap" is invented in terms of organization, this particular situation will undoubtedly remain the same for the next few years.

B-I DEFINITION OF THE 208 PROGRAM

The objective of the 208 Program, as far as Weber County was concerned, was 1) to define and quantify all existing uses of land and primary factors in the study area which affect land-use with respect to water quality, and 2) to develop five and twenty year future plans as an integral part of the water quality management plan together with proposals for the implementation of the land-use plans.

The rapid conversion of rural land to urban uses is creating concern for the future of the Weber Basin. Decisions made years ago affect the quality of today's rural environment. Just as present decisions will influence future land-use patterns, first decisions regarding rural development have spiraled public service cost for sewer and waterlines, transportation systems, solid waste disposal and other municipal costs associated with development. Any reluctance on the part of the appropriate governmental agencies to deal positively with the control of rural land development will probably result in a continuation of the uneconomical and undirected patterns of growth presently taking place in rural areas.

In order to prepare for the proposed planning task of achieving the level of water quality in the 208 planning area, which would satisfy all the criteria of Section 208 of the

Federal Water Pollution Control Act Amendment of 1972 and, thus, meet the 1983 goals of the Act, several objectives were established by the Weber County Planning COG. These objectives are unclear as to how they were formulated as citizen participation was not encouraged in the development of the objectives.

These objectives are outlined as follows in order of recognized importance by the above mentioned COG.

1) To develop a water quality management plan for the 208 Planning Area of Weber County by defining a technical and management program which would effectively abate pollution and preserve high standards of water quality.

2) To develop a cost effective management system for waste treatment and waste water sources and pollution abatement which will insure ground and surface water quality protection.

3) To provide an environmental assessment and land-use analysis capable of distinquishing land-use and its relation to water quality while satisfying environmental considerations.

4) To provide the staff capability to develop the waste treatment plan and establish a long range planning process.

5) To establish advisory committees in order to provide cooperation and coordination of the management and decision making process.

The actual planning process to be used in this project is one employing standard form used by many agencies throughout the country. The scope of the study will encompass identification, analysis, and evaluation of the various work elements over a two year period leading to the formulation of alternatives and

selection of plans which will result in solutions to water quality and water related environmental problems within the designated planning area.

The proposed plan will attempt to integrate and coordinate both technical needs for pollution control and management arrangements capable of implimenting the controls in order to attain the 1983 goals of the Act.

Emphasis in this case was to be placed on municipal and industrial waste water, stormwater run-off, source pollutants, land-use and environmental concerns as they relate to water quality. Next, the areawide waste treatment management alternative and plans will be used to examine regulation, control strategies, and priorities of implementation on a cost-effective basis.

The specific outputs thought to result from the 208 planning process will include:

A. Technical and management outputs

-Identification of anticipated municipal and industrial treatment works construction over a 20 year period.

-Planning for facilities for which 201 step 2 and 3 grant assistance is expected during the five year period following 208 approval.

-Identification of required urban stormwater runoff control systems.

-Establishment of a regulatory program to: provide for water treatment management on

on an areawide basis and for identification, evaluation and control or treatment of all point and non-point pollution sources; regulate the location, modification and construction of waste-discharging facilities, assure that industrial or commercial wastes discharged into publicly owned treatment works meet applicable pre-treatment requirements.

-Establishment of construction priorities over 5 and 20 year periods.

-Identification of agencies necessary to construct, operate, and maintain the facilities required by the plan to carry out the plan.

-Identification of non-point sources of pollution related to agriculture, mining, construction, and certain forms of salt water intrusion and procedures and methods (including land-use) to control those sources to the extent feasible.

-Processes to control the disposition of residual waste and land disposal pollutants to protect ground and surface water quality.

-Identification of the major management alternatives and selection of a management system to implement the plan.

-A schedule for implementing the plan, including costs of implementation.

-Required certifications relating to consistency with other plans.

B. Provisions for Plan Revision and Updating

-Performance assessment with regard to meeting the program objectives established during the planning process.

-Procedures for plan revision and updating.

C. Reports

-A condensed report on all plan elements, their implementation schedule and outputs.

-A full report on the planning process when completed.

In essence, the State of Utah and Weber and Davis Counties have basically adopted a policy of standards in specifying that all inter- and intra-state waters shall be of Class "C" (as defined by 208 doctrine) quality unless this goal is precluded by natural conditions. The policy also states that all discharges to inter- and intra-state waters so classified shall be of Class C or better water quality by 1983.

The objective of the Environmental Protection Agency as stated in the Federal Water Pollution Control Act amendments of 1972 is to restore and maintain the chemical, physical and biological integrity of the nation's waters. The national goals are:

A. That the discharge of pollutants into navigable waters be eliminated by 1985.

B. That wherever attainable, an interim goal of water quality which provides for the protection and propagation of fish, shellfish and wildlife and provides for recreation in and on the water be achieved by July 1, 1983; and

C. That the water quality standards established shall be such as to protect the public health and welfare, enhance the quality of water and serve the purposes

of this act.

The Environmental Protection Agency has adopted a policy of protecting stream waters for use. It is the policy of the EPA that all waters be protected for recreational uses in and/or on the water and for the preservation and propagation of desirable species of aquatic biota as part of the National Water Quality Standards Program. The use and value of water for public water supplies, agriculture, industrial, navigation, and other purposes are to be considered in setting standards.

Briefly, the EPA through implementation of the 208 Water Quality Program seeks to upgrade all waters of the country to a grade of class "C" or better by 1983. At the same time, EPA regulations seek to insure presently graded waters of class "A" or "B" remaining in the future as such and not allowing them to retrogress down to a class "C" or even worse classification. The EPA recognizes that some waters of the country will never be able to reach class "A" or "B" grades because of natural pollutents such as runoff silt, mineral springs, sulphur weeps, etc. However, even with natural pollutents all waters, the EPA feels, have potential of being graded a minimum of "C" or better by 1983.

The methodology used to hopefully insure the above desired results centers around the actual identification of non-point sources of pollution related to agriculture, construction, mining, urban uses, and other forms of intrusion. These methods include

as a mainstay efficient land-use planning to control the sources to the extent feasible. This same methodology is to be employed to guarantee that presently graded "A" or "B" waters do not regress into lower grades or classifications.

There are exceptions when some waters, because of naturally occurring poor quality, man-made pollution or technological limitations may not qualify for an accepted qualification. This determination must be made on a case-by-case basis following analysis of each such area. The analysis should be based on presently available information and must contain sufficient data to support the requests for exception based on natural conditions of the water or on technological limitations prohibiting the improvement of water quality to the degree necessary.

In implementing this policy the terms recreational uses and desirable species of aquatic biota must be given common sense application. The existence of man-made pollution should be viewed as a problem to be solved, not as an impediment against assigning the use classification. Desirable species of aquatic biota refers to the range of aquatic biota indigenous to the Weber area. In most cases, water for support of desirable aquatic biota and non-contact recreation can be covered in one use classification.

In the 208 Program the standards must provide that the most stringent value specified for each parameter shall be applicable where waters are classified for multiple uses. The contention

of the Environmental Protection Agency is that water quality criteria established national water quality goals. As such, the standards must reflect the levels of water quality which will protect and enhance the quality of waters to which they apply for all designated areas. The minimum values for specified water use classifications are those minimum recommended levels set by the National Technical Advisory Committee in its report to the Secretary of the Interior on Water Quality, April 1, 1968, and the recently proposed EPA criteria, October, 1973. No standard less restrictive than the minimum criteria will be approved unless it is affirmatively demonstrated to the regional administrator that the natural condition of a water does not exceed such lower quality. EPA policy in setting water quality standards is:

A. Numerical values be stated wherever possible.

B. Biological or bioassay parameters shall be employed when numerical values are not practicable (i.e., in mixing zones, zones of passage, or when synergistic reactions between pollutants is anticipated).

C. Narrative descriptions may be employed where other values cannot be established. Such criteria shall include detail sufficient to show clearly the quality of water intended.

The measure of time and limiting values which will govern must be defined, i.e. annual arithmetic mean concentration.

Where appropriate, the specified recurrence and duration of accepted design streamflow should be defined, i.e., seven-day, ten-year frequency return flow.

It is the policy of the United States Environmental Protection Agency that water quality standards be designed to enhance the quality of water. In cases where it is not possible to provide for prompt improvement in water quality at the time the initial standards are set, the standards should be designed to prevent any increase in pollution. In no case will standards providing for less than existing water quality be acceptable except those satisfying the anti-degradation provision.

B-II INTERNSHIP DUTIES

As a basis or foundation for the 208 Program, it was deemed necessary to first conduct an existing land-use inventory, with which to project future land-use patterns as they relate to water usage and water quality. My duties as an intern planner consisted of compounding details and facts as they relate to present land-use patterns. Item 3, page 14 best gives the description of how my job related to the overall 208 Program. (Also see Appendix A.)

The method of first conducting research as to present land-use patterns, secondly adding factors of population projections to speculate future land-use patterns, and thirdly, predicting future water usage and subsequent quality, appears basically sound from a planning point of view.

My actual work assignment was to take given data as provided by two CETA planners, and transpose it onto a master county map with all plots recorded to actual scale and size. These plots were each given an actual code number for their existing use. These numbers were then representated on the map in different colors or patterns. The final result was a map colored as to actual land-use with comparisons to previous maps to spot and visualize trends.

In an actual Pert chart (see Appendix A) supplied to the state clearing house for planning approvals, the above county

mapping process was proposed to take five months with three people performing the actual work. As it was I was able to transpose all information supplied daily in approximately one to two hours. The two CETA planners theorized that they could only constructively work three hours daily in order to make the process last five months. It appears that if responsible efforts were undertaken, this entire mapping phase could have been completed in two months rather than the proposed five months.

The above mentioned description was observed to be occuring throughout this entire planning body. Almost all attitudes were unconcerned with the professionalism required, to say nothing of the integrity that should be displayed by a recognized planning body.

In reviewing Appendix B, one may observe that $45,000 was earmarked for land-use studies and projections. When I left this agency, the majority of this work was done by myself and the two CETA planners in approximately three months time. I did not understand how $45,000 could possibly be spent on three persons salaries for the maximum of five to six months time. The day before leaving to return to school, I had the chance opportunity to see the director in his office. I asked him, out of curiosity, where the rest of the $45,000 was going as the work was almost completed by three underpaid persons in three months. He immediately turned red in the face

and replied that that information was supplied on a "need to know basis" and also "it was for him to know and for me to find out."

C EVALUATION OF PLANNING EFFORTS

Due to the political and planning situation, most procedings on the part of the planning director and his staff are attempted primarily in order to appease the demands of the county and all of the cities within the county.

The article from the Ogden Standard Examiner dated January 6th, 1976, is very typical of several articles that appeared while I was completing this internship. While the newspaper article points out a commissioner expressed concern with the problem, little change is ever made. Sadly, the trend for the future appears to remain the same.

On the surface, the Weber County-Ogden City Planning Commission appears to be doing, and is doing, the job as far as Federal specifications and guidelines suggest. Planning in this case as it appears in favorable newspaper articles, speeches, and other media is sometimes described very differently from its true character or fiber. In this situation, the local constituents appear to be satisfied with their planning body. It would appear to the citizen layman, functional and adequate.

As a potential future planner, I feel the efforts, goals, and output of a planning body should assume responsibility to include more than the minimum Federal guidelines call for. In this particular case, while the planning appears responsive, one must look through the cosmetics and attempt to see what

lies beneath.

As described, this COG does meet all Federal guidelines and specifications for 701 money and other funds, but the question must be posed, does this COG provide the sensitive, responsible direction a local planning body should provide? I maintain that it does not for the following described reasons.

First, this planning body is a combination of Ogden City and Weber County planners, all under the same roof with the same people providing information and input for both city and county alike. In one particular instance, the zoning and subdivision review committee acted in the same position for both city and county. Recently, a California developer approached the county zoning committee concerning rezoning of property near the suburbs of Roy and Slaterville. The developer had all the background information providing the market data, calculations, etc., substantiating the conclusion that the area needed a regional shopping center. This proposed action was tabled for study by the "county" planners awaiting further reports and information. Almost immediately the Ogden City Businessmen's Association began lobbying for denial as this proposed center, being located in the county, would deplete downtown Ogden. Ogden's downtown, incidently, suffers greatly from urban blight and decay. This downtown holds the city and county as a captive audience for almost all shopping needs, unless a customer wants to take the freeway to regional

centers in Salt Lake City, 40 miles to the south. To summarize, due to the political pressure exerted by business interests, the city planning staff and the county planning staff (one and the same) naturally turned down the zoning request. The resulting observation is that the whole area suffers since not one regional center has been built. The future holds the same promise as attempts have been made to build a mall in Ogden City proper, however, efforts are always denied as the local business interests explain it is not feasible to build as they don't have the capital outlay required. The conclusion of this example is that as long as the dual personality planning body exists, a regional center will never be built, and the area as a whole will suffer for it.

Secondly, the actual planning agency itself should be closely audited and examined. As mentioned before, little professional expertise or training exists on the part of the actual staff. While the Federal guidelines for funds on the surface are met, the question remains, is this responsible planning? This paper advocates that the dual personality of the COG should be split. The City should have its staff, and the County provide its staff. By eliminating this dual perspective, each enity can provide better for its citizenry.

Thirdly, the issue of citizen involvement becomes paramount to the situation. As long as the local people are not encouraged or given the adequate chance to provide input,

the result is predictable. The agency will continue on in its magnanimous ways, answering to no one except Federal auditors and keeping the citizenry uninformed and under-educated as to what planning really can be. This in itself becomes difficult to analyze as citizen participation is required to instigate citizen participation. The reader now asks, isn't citizen participation required to secure Federal funds? The answer is yes, however, the present citizen input group, formulated cosmetically once again for Federal guidelines, consists of primarily Ogden City businessmen, merchants, one lawyer, and two retired merchants. This committee has remained unchanged for approximately the last five years.

In terms of the 208 Program, the planning COG will undoubtedly perform as expected, provide all data required, and release the complicated matters to consulting firms. The Federal enity will be satisfied, the planning body having performed its function, and the resulting plan will be able to collect dust on a storage shelf. This behavior pattern appears typical throughout many planning organizations in this country.

When viewing the actual planning, policies, and resultant programs of the described Planning Commission, one cannot help but feel that there must be a better way. Possibly, there could be in this case if certain concepts of planning fundamentals

were to be adhered to.

If the "ideal" situation were to exist in Weber County, there are certain conditions that would have to be met to enable this to happen. First, planning theory assumes valid citizen participation provides accurate conceptual input into the planning process. Second, it is assumed that this described input should be acted upon by responsible and efficient administrators of the public will. Thirdly, if this desired accurate information is handled by competent administrators, the resulting implementation should be a true reflection of what the public sector or area needs and demands. In essence, the conceptual planning process may be compared to a delicate flower that is composed of many fragments and parts. If these components are misshaped or missing, the flower looses its value as an object of beauty. Planning by the same token is composed of many components that require by nature competent handling of its formulation and design to achieve the desired end result.

In the case of Weber County and Ogden City, the actual foundation of citizen participation is null and void in the sense that it currently does not exist. What does exist is a cosmetic board of businessmen that are not entirely representative of the community as a whole. Therefore, how

can planning be accurate and efficient in a system that assumes its basis to be correct but in fact is not?

As it currently exists, Ogden City and Weber County are pleasant locations that offer a good quality of life to the vast majority of the population. This fact seems to have convinced its members that the situation will remain constant for time and eternity. It is a well documented fact that if an area is ripe for development, and its members are totally unprepared for the event, the potential developmental explosion often times leaves an area in total panic when it does indeed happen. In this case, there is an abundance of open space, clean air, natural resources, etc., but consider also the fact that potential oil wells, shale deposits, and mining activities are beginning to breathe life into a creature that could emerge overnight to change the total complexion of this region.

For the above described reasons, the time to act is now to bring responsible and accurate citizen participation into the picture. Without this critical step, how can planners, efficient or otherwise, hope to assimulate required information to base their programs on? I speculate that once the citizen involvement and input process were to begin, the resultant overview would find a cleansing process underway to rid the area of irresponsible political and planning activities.

From examination of the 208 Program policy, one cannot find but very little information regarding the citizen participation process. The question of "why" remains to be answered. It is maintained that the population as a whole should be more than equal partners when it comes to considering what efforts are necessary regarding future land-use and the resultant water quality because of the land-use. As I view it, this is the perfect opportunity to begin the desired "input" process. The time framework would allow for it, and the subject matter is important enough. What remains is the initial spark to begin the fire. As it stands now, from the local viewpoint, the State or Federal Government is the remaining enity that can possibly provide the impetus.

To conclude this section: The Weber County-Ogden City COG, from a Federal specification point of view, meets the minimum requirements to conduct planning functions for the given community. The gap between the minimum requirements and a responsible planning framework are glaring. Little change for the better can be anticipated for the immediate future. The long range view is clouded as the State and Federal Government system must be depended upon to eventually move to correct the undesired conditions. This locale is not alone with its problem-ridden planning framework as many articles, books, and theories point to the problems of politics vs.

planning in many other communities. The concluding section will explore possible alternatives to the present existing condition and offer potential planning alternatives.

RECOMMENDATIONS AND CONCLUSION

Proposing accurate recommendations regarding the planning situation in the subject area is somewhat difficult to do in light of the concept of treating the symptom and not directly dealing with the cause.

Basically, the majority of all problems encountered by this planning commission can be attributed to three critical areas. These problems in order are; the dual aspects and political nature of the planning body; the lack of representative citizen participation; and the lack of astute, responsible planners. Each of these factors are interrelated and contribute to a closed "cause and effect" relationship explained later in this text.

The most pressing problem area regarding this planning body, as mentioned earlier, is the dual city-county nature of the planning commission itself, since the subject area is a county that is growing quickly in population and a city that is losing population. Each is bound to respond differently to a given situation. To expect a planning body under one roof and direction to react in a responsible fashion to the different needs of each is expecting a miracle. The example of the proposed regional shopping mall is a good case in point illustrating this problem.

To advocate changing this dual nature means reorganization of the political framework itself which maintains and nourishes the subject planning body. To do so would require a massive citizen awareness and participation program which presently does not exist. Hence, since one does not exist the chances are nill of changing the political system which is the foundation of the planning network. The point being made is that unless these three individual problems are identified, separated, and approached logically, the probability of improving any one problem is ruled out.

The second critical area of this discussion concerns the lack of citizen awareness and participation and the resulting lack of input to the planning process. One may ask, how does the concept of citizen input be instigated where none currently exists? Simply by responsible and sensitive planners pointing out the fact that the majority of the public is not involved, therefore, urging direct and indirect measures to instigate the start of the citizen participation process. This process once started would be hard for any sensible politican to ignore. In all probability, this process would snowball into the eventual splitting of this said planning commission rendering it more responsive to public needs and desires. Once this were to happen, planning could begin to operate more

openly and effectively, which presently is not the case.

This brings us to the third area and perhaps the key factor which presently allows the currently intolerable situation to exist. As discussed earlier, this planning body lacks professionally trained planners. The planners currently employed are labelled planners simply because their job slots, political influence, and savy evolved them into an occupation defined as "city planner". It is common knowledge that it is almost impossible to discharge a civil servant from his duties once he has passed his probation period of six months to one year. Therefore, only a fool would rock the political boat; hence, the process continues on "ad infinititum". This report speculates that if credible professionally trained planners were to be employed in this COG, the tide could be turned resulting in an entirely different planning framework. It is speculated that educated, trained, and credible planners would promogalate and cultivate the citizen participation process. This would result in a change of political composition allowing the planning commission to be split; hence, the final result would be looked upon as beneficial to all.

The question now remains, how do we encourage this commission to seek out and employ responsible planners? The only solution remaining presently is for the Federal Government and possibly the State Government go one step further in their specifications

for Federal dollars and require the hiring of certified planners to administer the proposed planning programs. This would clean up the existing situation to a point where sensitive and responsible planning had a reasonable chance of survival.

The planning framework as evidenced by the Ogden City-Weber County COG, provides marginal leadership and direction at best. To improve the quality of this planning commission, the three problem areas must be brought under control by the community as a whole. To allow specific interest groups to continue dominence in planning matters will only serve to hurt the community for all practical purposes. Time is running short for this region and its opportunity to direct itself by its own accord. The time to act to instill responsible and most of all credible planning is now.

To conclude this section, it is speculated that the Weber County-Ogden City Planning Staff is currently ill-equiped to do an effective job. This is due in part to the stagnated political system within the county, the poor administration, leadership, and other practices of the current director. The staff is poorly educated in planning principles and as a result flounders when it comes to key issues. The solution to these and other problems lies in removing the current bureaucratic entrenched enity, providing for public input measures, and upgrading the planning staff from the director on down.

APPENDIX A

PLANNING FLOW CHART

0 3 6 9 12 15 18 21 24

201 FACILITIES PLANNING

Coordinate with on-going 201 Facility Planning

Inventory Existing Municipal & District Waste Treatment Systems

Review Construction Grant Project Priority

Infiltration/Inflow Documentation

Development & Evaluation of Alternatives

Environmental Impact Assessment of Alternatives

Identification of Effluent Discharge Limitations

Determine Phase II Permit Conditions & Compliance Schedule

Select Preferred Alternatives

LAND USE PROGRAM

Obtain Aerial Photos & Prepare Base Mapping

Prepare Existing Land Use Mapping

Identify Growth Factors

Projected Demo, Eco, & Land Use Conditions

Projected Water Needs & Allocations

Demographic & Land Use Analysis

Review Land Use Goals & Policy Statements

Analyze Natural & Political Land Use Factors & Constraints

Identify Agricultural Land Use Factors

Identify Geological & Environmental Conditions

Recreational & Environmental Impact Studies & Projection

Solid Waste Disposal Site Studies

Land Use & Air Quality Relationship

Prepare 5 & 20 Year Land Use Plan

Evaluate Environmental Impact of Land Use Plan

Alternative Land Use Plan Formulation & Adjustment

Land Use & Water Quality Relationships

Select 5 & 20 Year Land Use Plan

Adjust & Finalize 5 & 20 Year Land Use Plan

Develop Land Use Regulatory Amendments

Publish Land Use Plan

Implement Land Use Regulatory Amendments & Procedural Changes

WATER QUALITY PROGRAM

Assemble Existing Data

Identify Critical Water Quality Conditions

Inventory Existing Dischargers/Point & Non-point

Review Water Quality Standards & Criteria

Identify & Quantify Present Water Use & Allocations

Identify & Quantify Future Water Resources Development

Inventory & Map All Surface Waters

Inventory & Map All Subsurface Water

Evaluate Water Quality Data

Identify Areas of Deficient Water Quality Data

Identify Point Source Monitoring Requirements

Identify Non-point Source Monitoring Requirements

Conduct Groundwater Quality Evaluation/ Additional Monitoring

Conduct Reservoir Monitoring Survey

Conduct Storm Water Drainage Program

Conduct In Stream Biological Monitoring

Develop Stream Modeling Requirements

Develop W.Q. Surveillance Program for surface & Groundwaters

Conduct Water Quality Monitoring for Point Source

Conduct Water Quality Monitoring for Non-point Sources

Define Critical Water Quality Conditions

Define Waste Load Contributors

Refine Stream Modeling System

Refine Phase II NPDES Permit Conditions

Refine Segment Classifications

Determine Pollution Loads from Non-point Sources

Determine Ground Water Quality

Evaluate Eutrophication Process in Reservoir System

Evaluate Storm Drainage Control Program

Relate Stream Biology to Water Quality & Pollution Sources

Project Future Impacts on Water Quality

Determine Feasible Point Source Pollution Controls

Determine Feasible Non-point Source Pollution Controls

Develop Recommendations to Maintain Ground Water Quality

Develop Recommendations for Reservoir Operation

Develop Recommendations for Storm Drainage Control

Develop Stream Water Quality Operational Plan

Integrate L.U., W.Q. & Mgmt. System Proposals/Initiate Evaluation

Evaluate Administrative & Legal Factors

Evaluate Financial Feasibility

Evaluate Environmental, Social & Economic Impact

Evaluate Monetary Costs

Refine Stream Water Quality Operational Plan

Refine Non-point Water Quality Operational System

Refine Ground Water Quality Operational Plan

Refine Reservoir Operational System

Refine Storm Drainage Operational Plan

Finalize & Select Integrated W.Q. Mgmt. Plan

Conduct Environmental Impact Assessment of the Selected Plan

Publish Final Water Quality Plan

Implement Continuing W.Q. Monitoring Program

Implement W.Q. Mgmt. Measures for Non-point Sources

Implement Urban Storm Drainage Control Plan

Implement Examination of Financial Avenues

Implement Provision for Plan Update

MANAGEMENT PROGRAM

Inventory Institutional Structures & Laws for Water Quality Service

Review Existing Water Rights & Allocations

Review Agricultural Management Practices & Government Policies

Analyze Management & Existing Legislation of Waste Water Systems

Analyze Inter-relationships & Legal Agreements of Water Quality Agencies

Evaluate Planning Area Experience in Water Quality Management Systems

Alternative Proposals for Water Quality Management Systems

Develop Land Use Coordination & Management System Plan

Develop Management Plan for Waste Treatment System

Develop Management Plan for Storm Drainage Control

Develop Management Plan for Agriculture

Refine Management Plan for Waste Treatment System

Refine Management Plan for Storm Drainage System

Refine Management Plan for Agriculture

Finalize Management System Plan Proposals

Develop Implementation Proposals for Management System

Publish Management System Plan

Implement Institutional & Legislative Requirements

Implement Agri. Waste Management Proposals

ADMINISTRATION AND COORDINATION

Hire Administrative Staff

Hire Program Consultant

Refine Tasks and Work Program

Establish Staff/ Develop Funding Program

Establish Land Use Advisory Committee

Establish Engineering Advisory Committee

Establish Management Advisory Committee

Establish Agricultural Advisory Committee

Land Use Committee Reviews Work Completed to Date

Engineering Committee Reviews Monitoring Program

Agri. Committee Reviews Management Practices & Proposals for Agri

Regional Land Use Concept Develop. of W.Q. L.U. Plan w/Adjoining 208 Agencies

Land Use Committee Reviews Goals & Policies, Growth Factors & Projections

Management Com. Reviews Analysis of Existing Gov. Systems

Land Use Committee Reviews 5 & 20 Yr. Land Use Plans

Engineering Committee Reviews Continuing Monitoring Program

Agri. Committee Reviews 5 & 20 Yr. Land Use Plans

Land Use Committee Reviews Adjustments to Land Use Plan to Compliment Water Quality Plan

Engr. Committee Reviews Various W.Q. Program Results & Projections

Management Com. Reviews Alternative Management System Proposals

Agri. Committee Reviews Agri. Procedures to Compliment W.Q. Plan

Land Use Committee Reviews Selected Land Use Plan

Management Com. Reviews & Adjusts Management Plan to Compliment W.Q. Plan

Land Use Committee Reviews Land Use Regulatory Amendment Proposals

Engineering Committee Reviews Integrated Plan Evaluation

Management Com. Reviews & Finalizes Management Plan & Implementation Proposals

Agri. Committee Reviews Land Reg. Amendment Proposals

Land Use Committee Coordinates Land Use Regulatory Amendments & Procedural Changes w/City&Co PC

Agri. Committee Coordinates Agri. Management changes with Farmers &

CITIZEN PARTICIPATION AND INFORMATION DISSEMINATION

Establish Citizen Advisory Committee

Major News Release on Committee Organization & Purpose of Study

Review 5 & 20 Yr. Land Use Plans/ Water Quality Proposals

Major News Release/ Public Meeting

Review Alternative Management System Proposals

Public Meeting on Alt. Systems for W.Q. Stormwater, Waste Water Treatment, Land Use Plans, Mgmt. Proposals

Review Recommended Water Quality Management Plan

Major News Release

Review Recommended Implementation Proposals

Public Meeting on Water Quality Plan & Implementation Proposals

Major News Release on Implementation of Plan

APPENDIX B

FINANCIAL STATEMENT

WEBER RIVER WATER QUALITY PLANNING COUNCIL
2 YEAR BUDGET PROPOSAL

Weber River Water Quality Planning Council	Administration & Public Relations		$165,000
County Attorney's Office	Legal Services for Adm. and Management Program		6,000
Weber County Auditor's Office	Accounting Services for Adm.		5,000
Management Consultants	Management Study		30,000
Neilsen, Maxwell & Wangsgard & Stevens, Thompson and Runyan	-Stream modeling and Water quality studies	$50,000	
	-Nonpoint sources studies agriculture & stormwater	110,000	
	-Groundwater studies	15,000	
	-Facility Planning	25,000	
	-New areas - waste treatment	65,000	
	-Integration & Evaluation	22,000	
	-Documentation	15,000	
	-Management, etc.	18,000	
		TOTAL	320,000
Weber County Health Department	-Stream sampling & non-chemical lab analysis	$65,000	
	-Pine View sampling & lab analysis	10,000	
		TOTAL	75,000
Davis County Health Department	Stream sampling		38,000
State Health Department, Lab.	Chemical lab analysis		30,000
Weber County Planning Commission	Land Use Studies & Projections		45,000
Davis County Planning Commission	Land Use Studies & Projections		45,000
Environmental Consultants	-Air Quality Studies	$10,000	
	-Environmental Analysis of plan	20,000	
		TOTAL	30,000
	STUDY SUBTOTAL		$789,000
	STATE HEALTH DEPT. ADD ON		+ 38,000
	STUDY TOTAL		$827,000