



## California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

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**Subject: Comment Letter – Proposal to Develop a Storm Water Program Workplan and Implementation Strategy**

The California Stormwater Quality Association (CASQA) would like to take this opportunity to provide comments regarding the Stormwater Strategic Initiative Proposal to Develop a Storm Water Program Workplan and Implementation Strategy – Including Projects for Immediate Action (Strategic Initiative). CASQA is a nonprofit corporation with approximately 2,000 members throughout California, including hundreds of local public agencies.

CASQA has long been a leader in the visioning and implementation of strategies for stormwater management in California. In this role, CASQA has been a leader in areas such as true source control and is ideally situated to be a partner in helping the State Board realize the vision outlined in the Strategic Initiative. CASQA is committed to serving as an active partner in the development of the workplans for the projects and supporting implementation of projects that are aligned with CASQA's goals and objectives.

Earlier this year, CASQA completed the first version of the *Vision and Strategic Actions for Managing Stormwater in the 21<sup>st</sup> Century* (CASQA's Vision). The purpose of this document is to provide CASQA with the actions to pursue a comprehensive plan for stormwater that will achieve the goals of the Clean Water Act, Porter Cologne, and improve the efficiency and effectiveness of stormwater management. This purpose is closely aligned with the purpose of the Strategic Initiative and will help guide CASQA's future efforts to achieve the vision of managing stormwater as a vital component of California's water resources, to support human and ecological needs, to protect water quality, and to restore our waterways. We are pleased to see that many of the guiding principles, issues and projects in the Strategic Initiative Proposal are aligned with CASQA's Vision.

**CASQA strongly supports the State Water Board's much-needed effort** to identify projects and provide resources to addressing longstanding issues and barriers to effective stormwater regulation and implementation. CASQA supports many of the identified issues and proposed projects, but has a few comments and suggestions for improvement. We are providing these comments in the spirit of aligning the Strategic Initiative and CASQA's Vision to support achieving the common goals and better support resource sharing. We have organized the comments into overarching comments and recommended additions to the Strategic Initiative and specific comments on the elements of the plan.

## **Overarching Comments**

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### ***Better integration and recognition of the value of stormwater as a resource in Integrated Water Resources Management programs should be addressed in the projects.***

Several of the proposed projects include components related to Integrated Water Resources Management, but none of the projects includes a comprehensive evaluation and discussion of how stormwater fits into the overall water resource planning for the state to support inclusion of stormwater into integrated regional water management plans (IRWMPs). In many IRWMP efforts, stormwater agencies have struggled to get stormwater projects incorporated into the plans as the role and benefits of stormwater recharge in the overall water supply picture are not clearly understood. Historically, and more recently due to the drought situation, the development of funding guidelines and priorities for funding have inadvertently resulted in lowering the priority of stormwater projects in the IRWM grant process due to higher priorities being placed on funding other types of projects that are more traditionally considered to generate water resources. There has also been a lack of recognition (and therefore lack of funding) of the benefits of green infrastructure projects for retaining stormwater, improving water quality, and providing resilience for climate change. Better guidance is needed for the development of the stormwater portion of IRWMPs and to help agencies understand how stormwater will be used as a productive part of the state's water supply.

This concern could be addressed by modifying projects 1c, 4, and/or 8 to include coordination with the Department of Water Resources (DWR) to identify an approach to the development of the stormwater portion of IRWMPs that supports direct prioritization of stormwater capture and coordinates with water management plans as they are developed. The approach should also identify other areas of water resource planning where consideration of stormwater as a resource should be incorporated at an early stage. The coordination should also consider project 1b and potentially include development of a guide or model to be consulted during the development of IRWMPs that addresses the relevant barriers identified as part of project 1b.

While the currently identified projects provide a good start at providing guidance for stormwater specific resource plans under SB 985 and reviewing grant programs to support more stormwater funding, a more comprehensive effort to truly integrate stormwater resource planning in the IRWMPs is needed to fully maximize the use of using stormwater as a water resource.

### ***A broader look at the regulatory programs is needed to fully address Guiding Principle 3- The Water boards Implement Efficient and Effective Regulatory Programs.***

The Strategic Initiative notes that it has been developed to build upon lessons learned and the successes of previous and existing stormwater permits. It would be helpful to include the list of lessons learned and successes to allow a better evaluation of the proposed projects. While, the Strategic Initiative includes a number of projects that address key issues that have been identified with stormwater regulatory programs, it is not clear how those issues relate to the lessons learned and successes and how those lessons learned will inform the projects. While CASQA supports many of these projects, we feel that an initial step is needed to use stormwater program priorities to align regulatory programs and/or modifications to the regulatory programs that will best

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address the priorities. Identification of stormwater program priorities will allow identification of strategies to address critical water quality issues associated with stormwater in an efficient and effective manner. This is consistent with the 2009 Little Hoover Commission finding that “California’s current system for ensuring water quality does not rank the biggest threats to water quality and systematically match its finite resources to address the most serious of them using the tools of scientific and economic analysis.”

To address this concern, CASQA recommends that a new project be included to identify stormwater program priorities and strategies to address those priorities and that this project be included as part of the immediate action item list. The appropriate strategies would then be incorporated into other projects, such as Project 16-Statewide Regulatory Framework for Municipal Storm Water or Project 5-Alternative Compliance Approaches for Municipal Storm Water Permit Receiving Water Limitations. Below are the proposed goal, objective, scope, and background for the project that could be included in the Strategic Initiative.

Goal: Ensure the most critical water quality issues associated with stormwater are identified and a corresponding strategy developed to address the issue.

Objective: Identify stormwater program priorities and develop guidance or policies that address the identified priorities.

Scope: The project would identify the highest priority issues for the stormwater program at the state considering impacts on beneficial uses, maximum benefit of the water body, water use opportunities, and other considerations that could impact the prioritization. Identify strategies to address the priorities that could include developing consistent permit requirements, developing guidance to support technical and regulatory issues, and modifications to Basin or Statewide Plans.

Background: Development of effective and sustainable stormwater programs requires identification of the stormwater program priorities that can best be addressed by municipalities and an understanding of the challenges to addressing these priorities. Identification of priorities and challenges will support development of effective and efficient strategies to address the priorities and improve the effectiveness of stormwater regulation to achieve water quality outcomes.

In addition to the project above, CASQA recommends inclusion of a project that will provide direction or development of modifications to water quality objectives, beneficial uses, and/or implementation procedures in Basin or Statewide Plans that are identified as strategies to address stormwater program priorities or result from better integration and consideration of stormwater during policy development (e.g. Project 20-Alignment of Water Quality Statewide Planning Efforts with Storm Water Program Implementation). While this project will be dictated by the results of other projects, it is a potential outcome of the other projects that should be acknowledged in the Strategic Initiative. As acknowledged by the State Board Order on the Los Angeles MS4 permit petition, significant challenges exist in retrofitting urban watersheds and having stormwater discharges meet water quality objectives. The use of appropriate regulatory

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tools to modify the regulatory requirements for stormwater should be considered as part of the overall strategy for stormwater management in California.

***A clear process is needed to incorporate new projects that may be an outgrowth of the currently identified projects.***

While the proposed strategic initiative is comprehensive, several of the projects may lead to identification of additional projects to be implemented. For example, Project 1b-Barriers to Stormwater Capture and Use could identify actions that would be turned into projects to address the identified barriers if they require significant effort. The Strategic Initiative should include an acknowledgement in Section 8 that projects that are an outgrowth of the work plan will be incorporated into the Strategic Initiative.

***Technical feasibility of stormwater recharge and other opportunities for using stormwater as a resource should be incorporated into projects discussing stormwater as a resource.***

While infiltration and groundwater recharge of stormwater is an important part of utilizing stormwater as a resource, it is not technically feasible to infiltrate in all areas of California. Projects 1a-Storm Water Capture and Use Goal, 1b-Barriers to Storm Water Capture and Use, and 1c-Increase Storm Water Capture and Use through Regulatory Approaches that discuss the use of stormwater as a resource should ensure that consideration of technical feasibility is included and potential options for utilizing stormwater as a resource are not limited to consideration of infiltration projects.

Additionally, Issues 1, 2, and 3 should include consideration of other ways stormwater could be utilized as a resource and incentivized in areas without the ability to infiltrate (e.g. storage), and should also include acknowledgement that the technical feasibility of infiltration needs to be a consideration when developing any incentive or regulatory programs related to infiltration and recharge.

***CASQA strongly supports the prioritization of Projects 1a, 1b, 4, 5, 6, 8 and 22 as Immediate Action Projects and recommend inclusion of Project 16 and Project 21 as Immediate Action Projects.***

The identified projects are closely aligned with the CASQA Vision and CASQA would be willing to support implementation of these projects. In many cases, CASQA may have existing or planned work efforts that could be leveraged to support implementation of these projects.

As an example, Project 22, the “Urban Pesticide Reduction” project builds on 15 years of partnership between the Water Boards and CASQA in working with pesticides regulators at California DPR and US EPA OPP on urban pesticides water pollution. The project is the essential step to institutionalize and make sustainable the water board/municipality partnership’s work with pesticides regulators toward ending current and preventing future pesticides water pollution. As discussed at the State Water Board’s November 2014 urban pesticides workshop, this project is ready to proceed, in concert with DPR’s management direction, based on a solid track record of successes, and ready for immediate implementation. CASQA, through its

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Pesticides Subcommittee, is committed to working with the Water Board toward the successful completion of this project.

We also recommend that Project 16-Statewide Regulatory Framework for Municipal Storm Water and Project 21-True Source Control and Pollution Prevention be moved to the immediate action project list. Project 16 is a critical project that has the potential to influence many of the other projects identified in the Strategic Initiative. Project 21 is critical for effectively addressing multiple pollutants prior to discharge to receiving waters throughout the state and institutionalizing pollution prevention activities that can prevent future water quality issues before they occur.

A number of Phase I MS4 permits will be up for renewal in the next year and many of the immediate action projects have the potential to impact these permit renewals. As a result, it is critical to move forward quickly on projects 5, 6, and 16 to support incorporating lessons learned into these permits.

In addition to the overarching comments provided above, CASQA has some specific comments on the various elements of the Strategic Initiative.

## **Comments on Guiding Principles**

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Overall, we are pleased to see that the guiding principles for the Strategic Initiative are closely aligned with the three guiding principles identified in CASQA's Vision:

- Sustainable stormwater management uses runoff as a resource, protects water quality and efficiently minimizes pollution.
- Policies, regulations, and funding need to support sustainable stormwater management.
- Public awareness, understanding, and appreciation of the value of stormwater is required.

While we feel that the guiding principles are aligned with CASQA's vision, we do have one recommended change to the guiding principles.

### ***Modify Guiding Principle #4 to clearly emphasize pollution prevention***

In reading the issues and projects associated with Guiding Principle #4, the majority are related to true source control and pollution prevention, but the guiding principle itself does not clearly emphasize pollution prevention. True source control is often the most effective and efficient method of addressing pollutants and it is important for the Strategic Initiative to clearly prioritize true source control and pollution prevention. To clarify the guiding principle and make clear the goal of this guiding principle, the following edits are suggested:

Water Boards Collaborate with other agencies to Solve Water Quality and Pollutant Problems ~~with an Array of Regulatory and Non-Regulatory Approaches through Pollution Prevention Strategies.~~

The description of the guiding principle should also specifically mention collaboration with the Department of Toxic Substance Control's (DTSC) Safer Consumer Products program and the California Department of Pesticide Regulation (DPR). Together these agencies have the authorities to regulate the sale, use and management of most water polluting products and coordination with these agencies will be a critical component of achieving this guiding principle.

## **Comments on Issues**

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CASQA recommends the following changes to the issues:

### ***Modify Issue #39***

Not all true source control efforts will require long-term connections. As a result, we recommend the following change to issue #39.

Long term institutional and industry connections are needed to implement effective true source control in some cases.

## **Comments on Projects**

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### ***Project 1a (Storm Water Capture and Use Goal) title and work products should better reflect the scope***

The scope for project 1a includes identification of existing strategies to promote storm water capture and use and achieve multiple benefits, consideration of new opportunities to increase storm water capture and use, and identification of ways to align Water Board programs addressing conservation, recycled water, and ground water management with storm water capture actions. However the title only acknowledges the task to define capture and use goals and the products to not reflect all of the elements discussed in the scope.

Please modify the title to be Storm Water Capture. Use Strategies and Goals and include aligning Water Board programs in the description of the staff report.

Additionally, as noted in the overarching comments, the project scope and background should be modified to acknowledge that technical feasibility for infiltration needs to be considered in setting goals and provide flexibility for identifying other strategies for stormwater capture and use. Any goals developed under this project should include flexibility to accommodate technical infeasibility.

### ***Project 1b (Barriers to Storm Water Capture and Use) scope should include consideration of constraints in MS4 permits and other regulatory programs***

The intent of this project is to identify and eliminate barriers to storm water capture and use, but regulatory barriers are not discussed in the project. In some existing MS4 permits, conflicting permit provisions, such as specific planning and land development provisions, present barriers to multi-benefit regional projects for stormwater capture and use. This project should also evaluate regulatory constraints, including permit provisions that could be barriers to stormwater capture and use.

As noted in the overarching comment above, incorporating stormwater projects into the IRWMPs has been challenging and could be considered a barrier to funding multi-benefit projects. The project may also want to consider including identification of challenges/barriers associated with funding these projects through grant programs, and how stormwater reuse can be compatible with reclaimed water use.

### ***Project 1c (Increase Storm Water Capture and Use through Regulatory Approaches) scope and background should be consistent***

The scope of project 1c is clear and discusses both new and existing development. It also provides a range of options that will be evaluated for incentivizing or requiring stormwater capture and use. However, the background discussion focuses on retrofits of existing urban development and appears to emphasize the identification of types of projects that could be implemented in retrofit situations. Please modify the background discussion to be consistent

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with the scope and focus on the identification of incentives rather than a discussion of potential retrofit requirements for existing development.

***Include a project to address Issue: Consistent and widespread messaging is needed to broaden the understanding of the value of stormwater***

While CASQA agrees that this issue should be incorporated into all proposed projects, we recommend including a specific project to develop a consistent message that can be utilized when implementing the projects. Without key message points, the issue may not be conveyed consistently and opportunities may be lost. Development of key message points should be a low cost project that would support implementation of all of the projects.

***Project 5 (Alternative Compliance Approaches for Municipal Storm Water Permit Receiving Water Limitations) should include statewide permits***

The discussion under Project 5 focuses on implementing alternative compliance approaches for receiving water limitations across the various Regional Water Boards, but does not discuss permits that are developed by the State Water Board, such as the Phase II permit. The discussion should acknowledge that the compliance pathways would be evaluated for permits developed by the State Water Board and Regional Water Boards. The project should also consider lessons learned from existing alternative compliance development efforts and ensure that conflicts with the existing efforts are not created by the new guidance.

Additionally, CASQA recommends considering broadening this project to fully consider the implications and process for determining compliance with receiving water limitations and not limit the scope to application of the alternative compliance approach statewide. While the State Board Order on the Los Angeles MS4 permit provided guidance on many issues, it also noted that many of the findings regarding permit conditions and determining compliance were specific to the facts and conditions present in the Los Angeles Region. Additionally, some approaches to compliance may not support the other goals of this Strategic Initiative to maximize stormwater capture and use. For example, this project should include consideration of the results of Project 1c to determine if there are alternative compliance provisions for receiving water limitations that would better support stormwater capture and use. CASQA recommends that this work be done as quickly as possible to allow incorporation of the results of the projects into upcoming MS4 permit renewals.

***Project 6 (Watershed-Based Compliance and Management Guidelines and Tools) should include consideration of a pollutant trading/credit framework and be better linked to the project 12 discussion***

CASQA supports the incorporation of watershed based permit provisions into MS4 permits using consistent methods that allow for regional flexibility. The proposed project supports this approach to developing guidance and tools. However, watershed permitting to date has been in some of the more urban areas of the state. In many areas, other sources, particularly agriculture, can be significant pollution sources to the waterbody that may prevent waterbodies from attaining standards solely through addressing pollutants in MS4 discharges. In some cases, it



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may be more cost effective to address these sources to bring the waterbody into compliance as compared to addressing sources of pollutants in MS4 discharges. The watershed permitting processes to date have focused on stormwater planning only and are not structured to effectively address watersheds with other significant pollutant sources. CASQA recommends consideration in the guidance of tools that can be used in these situations, including establishing a pollutant trading/credit framework. Additionally, any reasonable assurance analysis guidance should recognize that addressing stormwater discharges alone might not be sufficient to achieve water quality standards in all waterbodies.

Additionally, the discussion of the reasonable assurance analysis guidance in this project focuses on modeling. However, in project 12, the discussion acknowledges that simple numeric tools may be sufficient and complex modeling is not needed in all cases. CASQA recommends that the discussion of modeling be modified to discuss quantitative numeric analysis and include a similar discussion to project 12 that the guidance will reflect the fact that complex modeling will not be needed in all cases. Additionally, the results of the evaluation in project 12 should be incorporated into the guidance being developed under this project. It is critical that the monitoring, effectiveness assessment and watershed planning development tools and guidance are connected to avoid conflicts and unnecessary expenditure of resources.

***Project 7 (Post-Construction Requirements for Watershed Health) should recognize the connection to using stormwater as a resource***

As discussed in the comments on Project 1b above, in some MS4 permits, the planning and land development requirements, including post construction requirements, have unintentionally raised barriers to implementation of multi-benefit regional projects in some cases. Development of post-construction requirements should not only consider watershed health, but also the potential impact on using the stormwater as a resource in the most beneficial way for the watershed.

***Project 9 (Municipal Storm Water Permitting Compliance Cost) should include consideration of the benefits of stormwater program implementation***

In Project 10 (Industrial and Construction Storm Water Permitting Compliance Cost), identification of the expected benefits of compliance for industrial and construction stormwater permittees is included in the project background discussion. The expected benefits of implementing the stormwater program should also be included in the MS4 program cost analysis under Project 9.

***Project 12 (Municipal Storm Water Program Monitoring and Effectiveness Assessment) should include development of baseline monitoring guidelines***

As part of this project, it would be very helpful to develop baseline monitoring guidelines that are clearly linked to program effectiveness, the adaptive management process, and answer management questions. These baseline monitoring guidelines would provide consistency for stormwater monitoring programs in California, but allow for regional flexibility where needed to address specific goals or coordinate with other monitoring programs.

***Results of Project 14 (Storm Water Permit Compliance Evaluation) should be used to refine stormwater permit requirements***

The scope of project 14 includes identification of permit requirements that provide the most effective water quality outcomes for focusing compliance evaluations. As this information is developed, it should also be utilized to refine stormwater permit requirements to eliminate elements that do not result in water quality outcomes. The results should be incorporated into project 15 when developing standardized minimum control measures.

***Project 16 (Statewide Regulatory Framework for Municipal Storm Water) should start with an identification of constraints and inconsistencies to be addressed by the framework***

While a number of issues have been identified through the Strategic Initiative development process, part of project 16 should be a comprehensive identification of the constraints and inconsistencies in the existing regulatory structure and permits that need to be addressed. This evaluation will then help refine some of the other projects in the Strategic Initiative (like Project 15-Standardizing the Minimum Control Measures) and may result in the identification of other projects.

We also recommend that this project be moved to the immediate action project list. This is a critical project that has the potential to influence many of the other projects identified in the Strategic Initiative.

***Project 20 (Alignment of Water Quality Statewide Planning Efforts with Storm Water Program Implementation) should have a broader scope that better matches the project***

CASQA supports the need to better align planning efforts with storm water program implementation, but feels that the project objective and scope are too focused on the biological integrity plan. The project objective should be to define the tools and strategies necessary to achieve the goal of ensuring that water quality planning efforts are well integrated into the storm water program. The scope of the project should then explain how the tools and strategies will be developed and then piloted using the biological integrity plan.

CASQA also feels that it is critical to implement this integration in the development of the statewide bacteria objectives. Bacteria are a critical pollutant for stormwater dischargers and the development of the statewide objectives should consider storm water program implementation. It may be warranted to pilot the integration with the statewide bacteria objectives rather than the biological integrity policy given the high priority of bacteria for many stormwater dischargers.

If the biological integrity plan is used as the pilot, the recommendations in the National Research Council Report on Urban Stormwater Management in the United States (NRC, 2008) should be considered in the integration. One of the recommendations was as follows:

**“Communities should use an urban stream classification system, such as a regionally adapted version of the Impervious Cover Model, to establish realistic water quality and biodiversity goals for individual classes of subwatersheds.** The goals for water and habitat

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quality should become less stringent as impervious cover increases within the subwatershed. This should not become an excuse to work less diligently to improve the most degraded waterways— only to recognize that equivalent, or even greater, efforts to improve water quality conditions will achieve progressively less ambitious results in more highly urbanized watersheds. This approach would provide stormwater managers with more specific, measurable, and attainable implementation strategies than the one-size-fits-all approach that is promoted in current wet weather management regulations.”

### ***Project 21 (True Source Control and Pollution Prevention) should include pollutant source identification studies and coordination with existing programs***

CASQA recommends that the scope of the project be expanded to include the identification of pollutant sources. This will allow the identification of the best pollution prevention strategies to be identified. Proposed language to be added to the scope of the project is as follows:

Conduct pollutant source identification studies for pollutant priorities, to identify their sources in urban runoff. Based on the specific sources of each pollutant, identify and examine feasible, cost effective control strategies including prevention-based strategies (including product substitution, life-cycle management strategies, and operational source controls).

CASQA also recommends consideration of renaming the project to be pollutant source identification and pollution prevention. This name would reflect the proposed changes in the scope. We also recommend that this project be moved to the immediate action project list.

### ***Project 22 (Urban Pesticide Reduction) should ensure the efforts are linked to compliance requirements for municipalities***

CASQA supports the key components of the scope of Project 22, but recommends that the results of the project be considered when developing other projects, such as Project 16 and Projects 5 and 6. Key components of the project are that it recognizes that DPR and US EPA OPP as the lead responders to pesticides water pollution; provides for development of a standard approach for appropriate and reasonable pesticide control requirements for municipalities; and envisions a coordinated pesticides monitoring approach for California’s urban watersheds that would be more efficient and effective than today’s monitoring patchwork. However, it is crucial that the results of this project get fully integrated into MS4 permit requirements and duplicative and/or conflicting permit requirements (such as monitoring) are resolved.

As mentioned in the general comments, CASQA supports this project as an immediate action project. This project provides for development of the long envisioned and much needed framework for urban pesticides pollution control. This project is important because it will address multiple urban pesticides TMDLs (both adopted and in development) and it is essential for response to widespread aquatic toxicity associated with currently used pesticides that the Water Boards have found in urban watersheds.<sup>1</sup> While this project requires a commitment of

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<sup>1</sup> Reference: Phillips BM, Anderson BS, Siegler K, Voorhees J, Tadesse D, Webber L, Breuer, R. 2014. Trends in Chemical Contamination, Toxicity and Land Use in California Watersheds: Stream Pollution Trends (SPoT) Monitoring Program. Third Report - Five-Year Trends 2008-2012. California State Water Resources Control Board, Sacramento, CA.

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Water Board staff time to see it through, the project will generate a substantial net cost savings for the Water Boards by avoiding future 303(d) listings and TMDLs.

In closing, CASQA restates its strong support for this effort, and we encourage its timely completion. We appreciate the opportunity to comment on the Strategic Initiative and look forward to working with you on implementation of the projects. To support the project implementation, we would recommend establishing an implementation committee that CASQA could participate in to keep the projects moving in a timely manner and support coordination with activities CASQA will be conducting to implement CASQA's Vision. Please contact CASQA Executive Director Geoff Brosseau at (650) 365-8620 if you have any questions or would like to discuss our comments further.

Sincerely,

A handwritten signature in cursive script, reading "Gerhardt J. Hubner".

Gerhardt Hubner, Chair  
California Stormwater Quality Association

cc: CASQA Board of Directors and Executive Program Committee