

Standardizing Cost Reporting in Municipal Stormwater Permits

Stakeholder Workshop

April 25, 2022, 1:00-4:00 pm



STORMS, Division of Water Quality

California Water Boards

Workshop Agenda

- Workshop Logistics
- Background & Purpose of Today's Workshop
- Project Overview, Schedule and Proposed Cost Categories
- Breakout Sessions
- Open Discussion
- Wrap up

Workshop Logistics

- Workshop is being recorded
- Participants will be muted until comment period
- Chat is disabled
- Comments can be emailed during the presentation to:

STORMS@waterboards.ca.gov

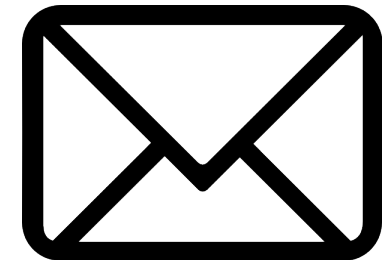
Purpose of Today's Workshop

- Provide a summary of the proposed draft categories
- Allow stakeholder discussion about a select number of topics
- Solicit comments early in the process

Providing Feedback on Cost Categories

- Oral Comments (today's workshop)
- Written Comments
 - STORMS@waterboards.ca.gov
 - Nabiul.Afrooz@waterboards.ca.gov

Please include "**Standardized Cost Reporting in MS4 Permits**" in the subject line





Attendee Poll

Water Boards Stormwater Strategy



Lead the evolution of stormwater management

- Stormwater is a valuable resource
- Support policies for collaborative watershed-level stormwater management and pollution prevention
- Remove obstacles to funding and develop resources
- Integrate regulatory and non-regulatory interests
- Strategy to Optimize Resource Management of Stormwater Website:
 - https://www.waterboards.ca.gov/water_issues/programs/stormwater/storms/

Project Background

- STORMS Objective 4: Establish Financially Sustainable Stormwater Programs
- [State Auditor Report](#)
 - State and Regional Water Boards must do more to ensure that local jurisdictions' costs to reduce stormwater pollution are necessary and appropriate.
- [Guidance for Obtaining Phase I MS4 Permit Compliance Costs](#)
- Office of Water Programs: [Evaluating Municipal Spending in California](#)
 - [STORMS seminar](#)

Project Benefits



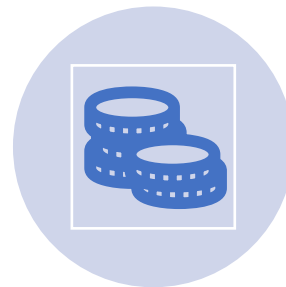
Estimation of true implementation cost for current and new permit requirements



Transparency to obtain program funding



Statewide dataset for stormwater management activities



Tools for cost tracking

Project Schedule

3Q 2021	4Q 2021	1Q 2022	2Q 2022	3Q 2022	4Q 2022	1Q 2023
Stakeholder outreach						
Background research						
	Draft cost categories					
	Case studies					
			Staff Report, reporting tool development			
				Draft model permit language		
					Public Comment Period	

Standardized Cost Categories: Methodology

- Standardized cost reporting categories and a tool are key deliverables
- 2020 guidance document, existing permits and past annual reports reviewed
- Categories satisfy following criteria:
 - Directly relate to permit requirements
 - Address diverse approaches in different regions
 - Offer easy transitioning from existing categories

Draft Proposed Cost Categories

- Federally recommended MCMs:
 - Public education, outreach, involvement and participation
 - Illicit discharge detection and elimination
 - Construction site management
 - Municipal maintenance
- Industrial and commercial facilities
- Water quality monitoring
- Overall program management and administration
- Planning and land development
- Projects
- Trash management
- Special programs
- Miscellaneous expenditures

[Stakeholder Outreach Document](#)
[\(Draft Category Descriptions\)](#)

Overall Program Management and Administration

- Permit compliance administration and management activities
 - Stormwater management plan development
 - Budget planning
 - Asset management
 - Permit-mandated reporting
 - Program effectiveness assessment
 - Stakeholder meetings

Municipal Maintenance

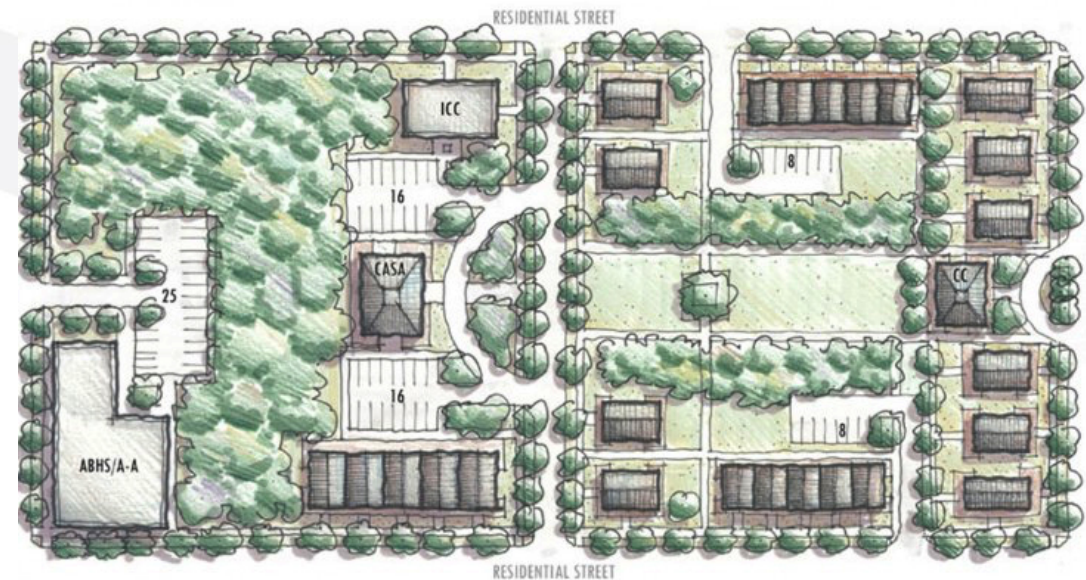
- Routine activities for municipal operation and maintenance
 - Public facilities inventory development and maintenance
 - Stormwater system operation and maintenance
 - Street, road parking facilities maintenance
 - Integrated pest management
 - internal training
- Expenditures not included
 - New development or redevelopment
 - Trash control



<https://www.bothellwa.gov/461/Stormwater-Inspections>

Planning and Land Development

- Planning activities for new development and redevelopment
 - Standard and specifications
 - Plan review
 - Education and training
 - Tracking and enforcement
- Post-construction BMPs



<https://www.koonsdesign.com/services/community-land-development-planning/>

Projects

- Medium and large projects (direct cost > \$50k) related to stormwater management
- Operation and maintenance should be reported under the municipal maintenance category
- Primary function of the project should define project category.



Trash Management

- Activities designed and performed to comply with trash provisions
 - Trash assessment and mapping
 - Trash TMDL implementation
 - Trash capture device installation and maintenance
 - Monitoring and reporting
 - Inspection and enforcement

- Routine municipal activities for trash control
 - Street sweeping



<https://www.tradebeusa.com/catch-basin-cleaning>

Special Programs

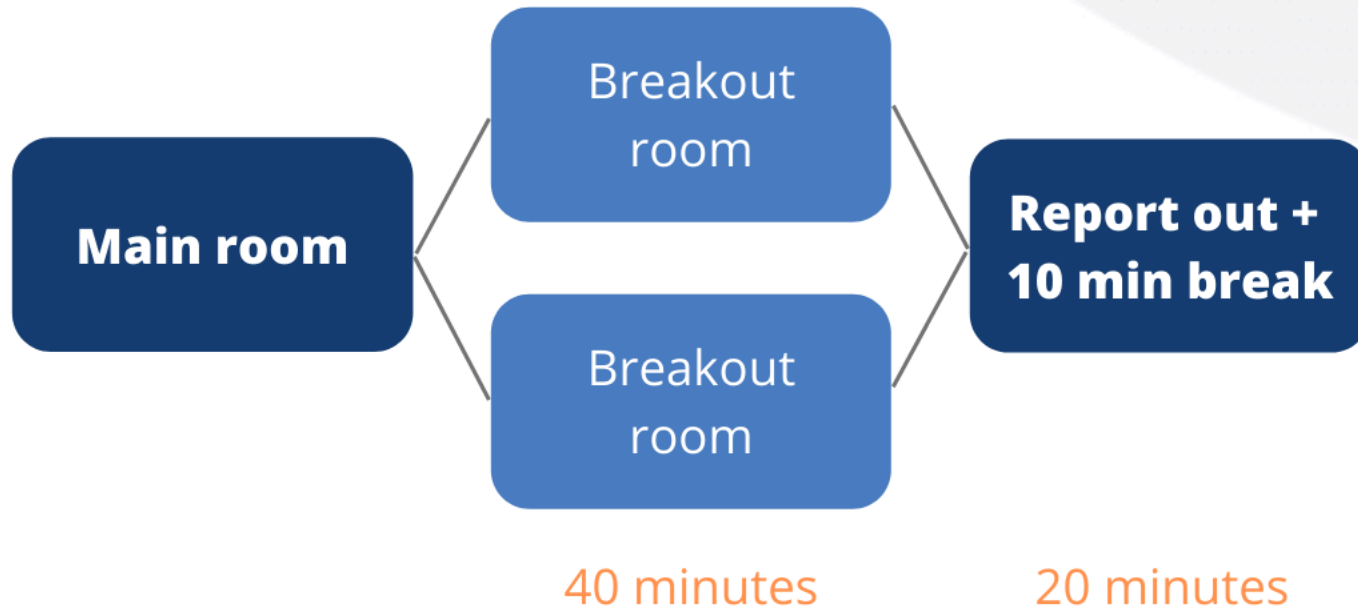
- Obtains cost information about various region-specific MS4 program elements.
 - Watershed management programs
 - Pollutant specific programs
 - Discharges associated with homeless populations
 - TMDL programs

Miscellaneous Expenditures

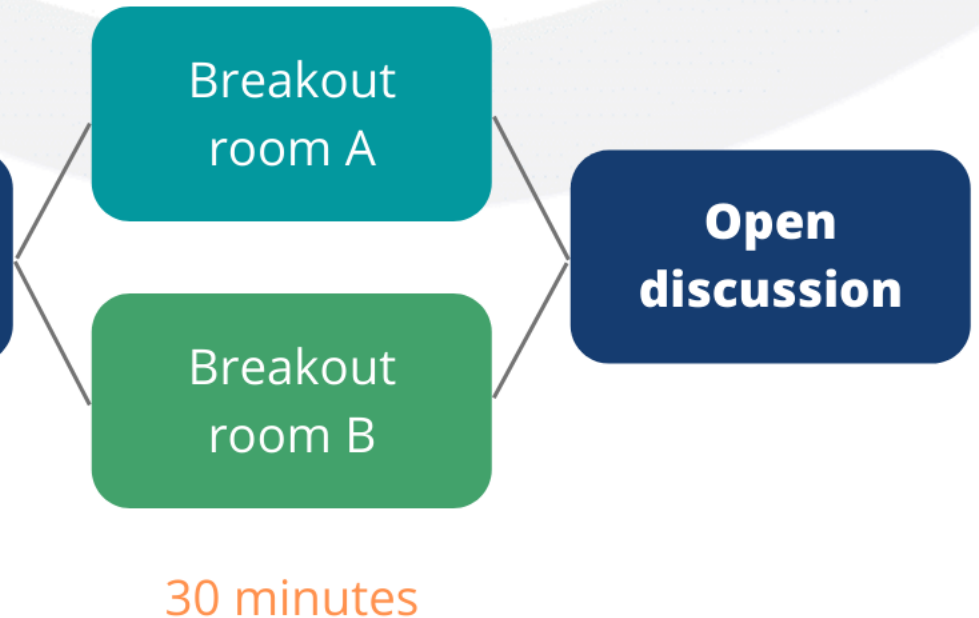
- Fees or expenditures that do not fit into other categories
 - NPDES permit fees
 - Membership fees
- Only permit implementation related costs
- Justification description required

Breakout Sessions

Session 1: Same questions (auto-selected)



Session 2: Different questions (self-selected)



Join Breakout Session #1

1. Is there a permit mandated activity you believe is not captured in the proposed list of categories?
2. Do you have examples for any permit-related activities which are not currently being reported due to difficulties associated with cost accounting or other reasons?
3. Do you have suggestions on changes to the categories to make them more useful to you (the permittee)?
4. Staff would appreciate stakeholders' feedback on other aspects of the Project. Do you have any comments on the cost reporting process or use of the cost data?



Report out on Breakout Session #1

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10-minute break

Join Breakout Session #2

- Room A
 - Accounting for multi-benefit projects
 - Utilities of pollutant-specific categories
- Room B
 - Unique programs in your region
 - Tracking BMP implementation costs
 - Examples for miscellaneous expenditures



Report out on Breakout Session #2

Breakout Session 2 (Room A)

- Some activities serve multiple purposes (e.g., street sweeping; storm drain cleaning), or go beyond the permit-mandated minimum requirements (e.g., inspection or cleaning frequency). For accurate cost accounting, what are some ways to determine and attribute a fair portion of costs associated with these activities?
- Some permits recommend tracking for different pollutant-specific cost categories (e.g., PCB control cost; cost of pesticide programs). To what extent do these pollutant-specific activities overlap with other cost reporting categories (e.g., planning and land development, Projects)? Do you see a need or benefit in separately tracking pollutant-specific expenditures within a stormwater program?

Breakout Session 2 (Room B)

- What unique programs are you implementing that could fall under Special Program category?
- The Projects category is intended to track and gather capital cost data for implementing various structural BMPs. A minimum threshold of \$50,000 total project cost has been proposed for including BMP implementation costs under this category. How appropriate is this approach for gathering structural BMP implementation cost? How reasonable is this \$50,000 threshold?
- The Miscellaneous Costs category is intended to allow reporting expenditures that do not fall under other categories. Based on your existing program, what expenditures would you like to report under the Miscellaneous Costs category?

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Comment Options



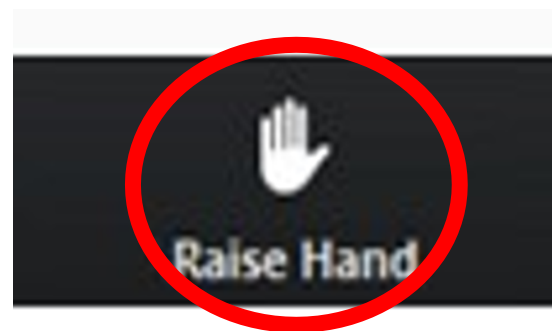
California Water Boards

Participation Instructions

Everyone will remain muted until called upon

Computer Commands

- To raise your hand, find the “Raise Hand” button on your screen



Phone Commands

- *9 to raise hand
- *6 to mute/unmute



Oral Comments

- Please wait for the moderator to invite you to comment
- Please state your first and last name
- Please include applicable affiliations with agencies or organizations

Telephone Commands (if calling in using a telephone):

*9 to raise hand

*6 to unmute

Written comments can be sent anytime via email to:

STORMS@waterboards.ca.gov

Subject line: "Scoping Meeting"

Written Comments

Written comments can be sent via email to:

STORMS@waterboards.ca.gov

Subject line: "Standardized Cost Reporting in MS4 Permits"

All comments may be made public

Project Updates

Project webpage:

- https://www.waterboards.ca.gov/water_issues/programs/stormwater/storms/obj4_proj4c.shtml

Subscribe to Stormwater Strategy email list:

- Visit bitly.com/swrcb_subscribe
- Select "Water Quality," check box for "Stormwater Planning"
- Add your name and email and click subscribe.

Thank You

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Amanda Magee: Amanda.Magee@waterboards.ca.gov

Public Comments: STORMS@waterboards.ca.gov