

Science Advisory Panel on CEC's

Stormwater Management Perspective

October 15, 2020



CALIFORNIA STORMWATER
QUALITY ASSOCIATION®

ABOUT CASQA



Who We Are

CASQA has been a leader since 1989 when the field of stormwater management was in its infancy. CASQA's membership is comprised of a diverse range of stormwater quality management organizations and individuals, including over 180 cities, 23 counties, special districts, federal agencies, state agencies, ports, universities and school districts, wastewater agencies, water suppliers, industries, and consulting firms throughout the state.

On a weekly basis, CASQA communicates directly to more than 1,850 individuals, including the CASQA membership, State Water Board, Regional Water Board, and EPA staff.

Mission Statement

On behalf of California stormwater permittees, CASQA advances sustainable stormwater management protective of California water resources.

Vision Statement

CASQA advances the stormwater field through a network of highly engaged professionals that:

- **Lead:** CASQA provides leadership that results in sustainable statewide stormwater policies, regulations, and programs
- **Collaborate:** CASQA provides a forum for stormwater professionals to share ideas and identify solutions for regulatory, technical, and scientific challenges
- **Educate:** CASQA produces resources and hosts events that inform, educate, and train stormwater professionals, regulators, and the public on the value, challenges, and scientific and technical aspects of stormwater management
- **Support:** CASQA tools and guidance promote implementation of sustainable stormwater programs
- **Develop:** CASQA provides opportunities for the growth of stormwater professionals and development of current and future stormwater leaders

CASQA represents over 26 million Californians

How We Operate

From its founding, CASQA has a long history of serving as an advisor and partner to

working with permittees, regulators, and other stakeholders to develop solutions to complex challenges.

CASQA Members Include:

• Counties: 23

San Diego	Santa Cruz
Riverside	Stanislaus
Los Angeles	Lake
Orange	San Mateo
San Bernardino	Placer
Santa Barbara	Monterey
Ventura	San Luis Obispo
Sacramento	Fresno
Alameda	El Dorado
Marin	San Joaquin
Contra Costa	Santa Clara
Napa	

• Cities: more than 180

- **Ports:**
Los Angeles, Oakland, Stockton, Long Beach, San Diego
- **Government Agencies:**
US Army Corps of Engineers, Caltrans, California Department of Parks and Recreation
- **Educational Facilities:**
UC Davis, UC San Diego, UC Riverside, Stanford, Cal Lutheran, Cal State Sacramento, CSU Channel Islands, Cal State Northridge, San Diego Unified School District

• Conservation Organizations:

- Golden Gate National Parks Conservancy, Monterey Bay Aquarium
- **Water Districts / Utilities Providers:**
Metropolitan Water District of Southern California, County Sanitation Districts of Los Angeles County, Orange County Sanitation District, Los Angeles Department of Water and Power, Southern California Edison



California Stormwater Quality Association*

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

Vision for Sustainable Stormwater Management

October 2020

Vision for Sustainable Stormwater Management

OCTOBER 2020



Appendix: CASQA's Vision-at-a-Glance

Principle #1: Program Implementation – Projects and programs that use stormwater as a resource, protect water quality and beneficial uses, and efficiently minimize pollution are critical for sustainable stormwater management.

Action 1.1: Maximize Urban Stormwater Capture

Action 1.2: Minimize Pollution Through True Source Control

Action 1.3: Maximize Effectiveness of BMPs, Green Stormwater Infrastructure, and Low Impact Development

Principle #2: Permits, Regulations, and Legislation – Permits, regulations, and legislation need to support sustainable stormwater management.

Action 2.1: Develop a Statewide Regulatory Approach Focused on Sustainable Stormwater Management

Action 2.2: Develop Regulations and Guidance to Support Sustainable Stormwater Management

Action 2.3: Promote Legislation That Is Essential for Sustainable Stormwater Management

Principle #3: Public Education – Public awareness, understanding, appreciation, and support of the value of stormwater is essential to sustainable stormwater management.

Action 3.1: Increase Support for Funding and Sustainable Stormwater Projects

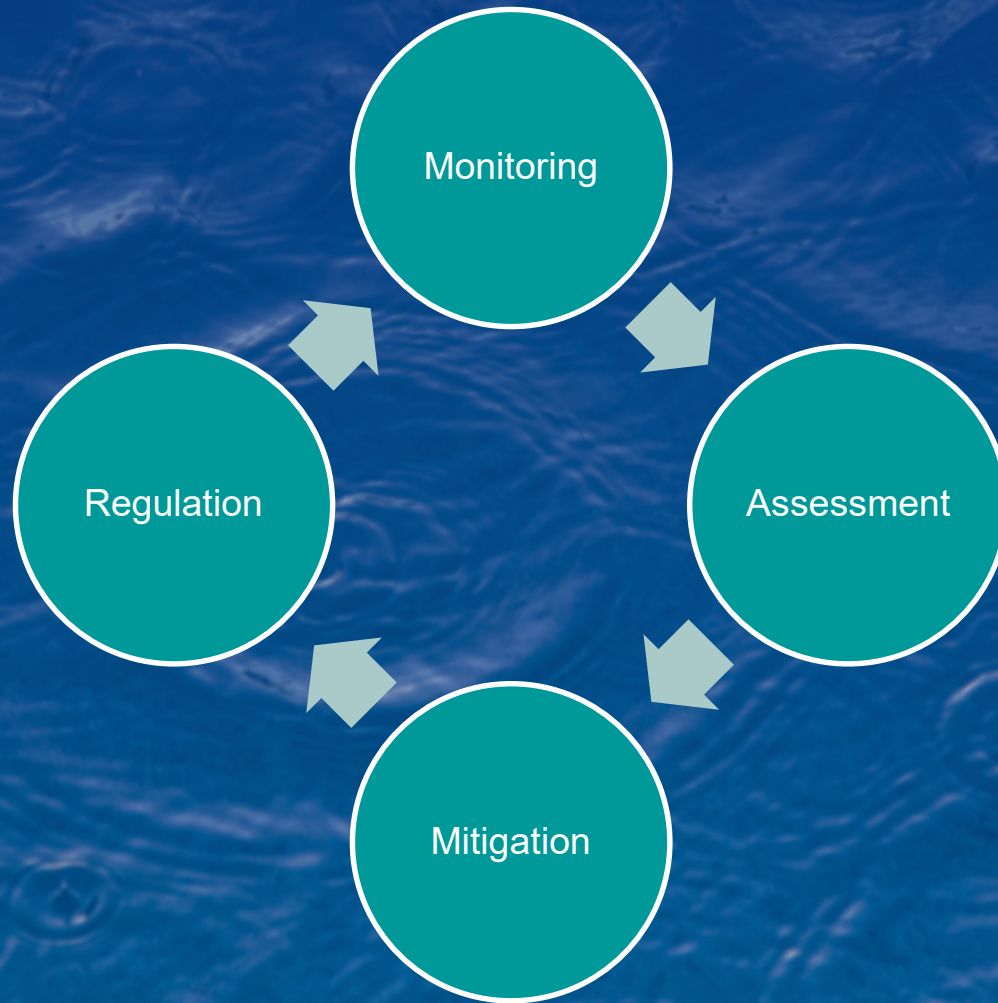
Principle #4: Funding – Significant financial investment is required to achieve sustainable stormwater management.

Action 4.1: Determine the Resource Needs for Sustainable Stormwater Programs

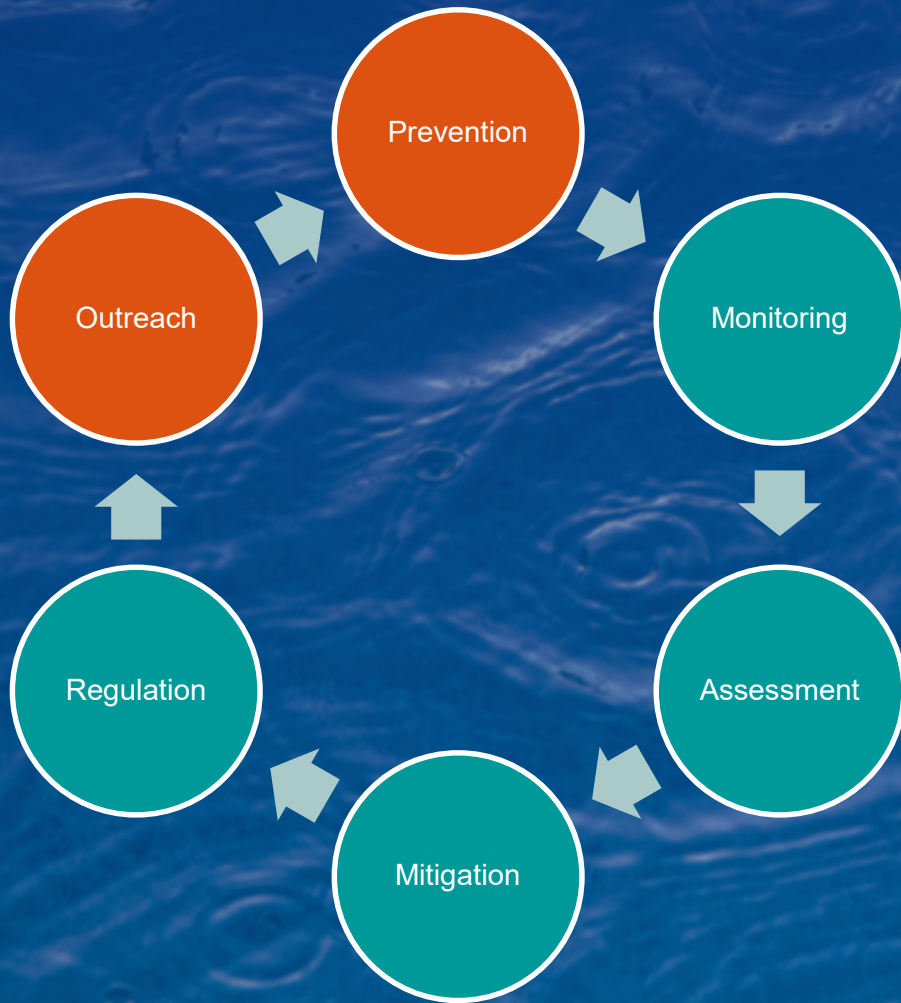
Action 4.2: Develop a Dedicated Funding Source for Stormwater Programs

Action 4.3: Increase Supplemental Funding Opportunities for Stormwater Programs

Typical Approach



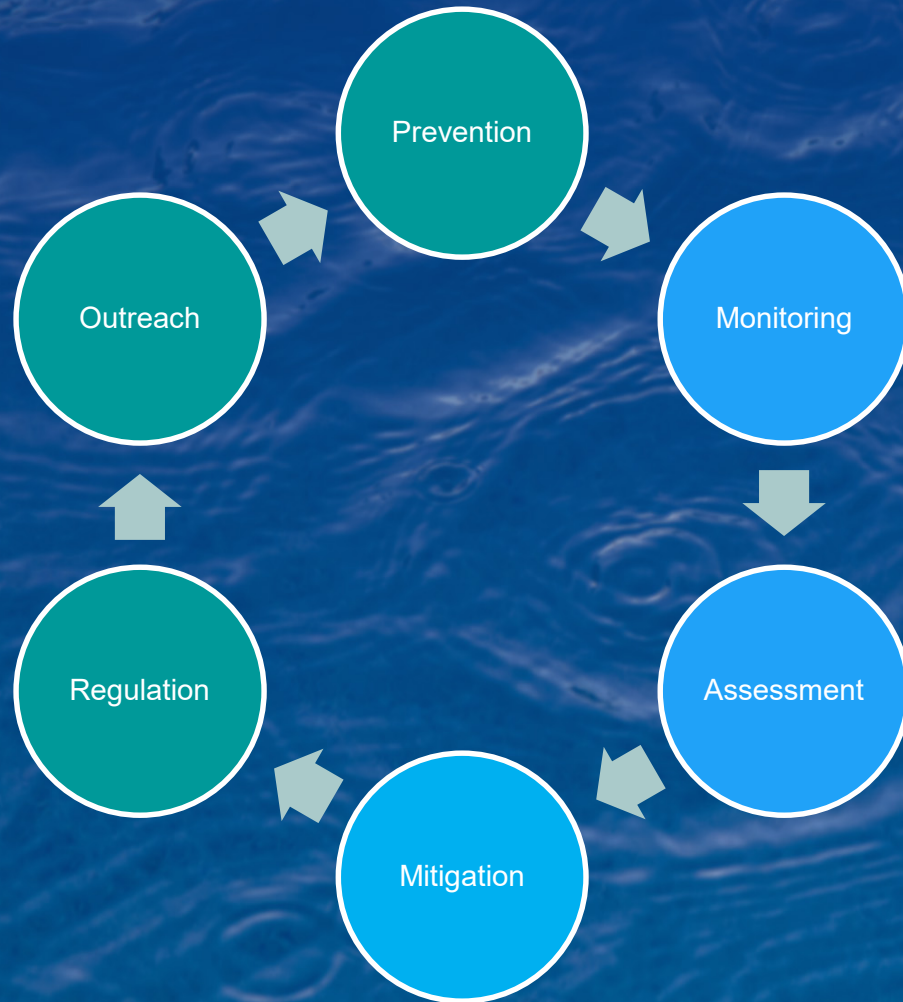
Holistic Solution



Prevention =
Source Control

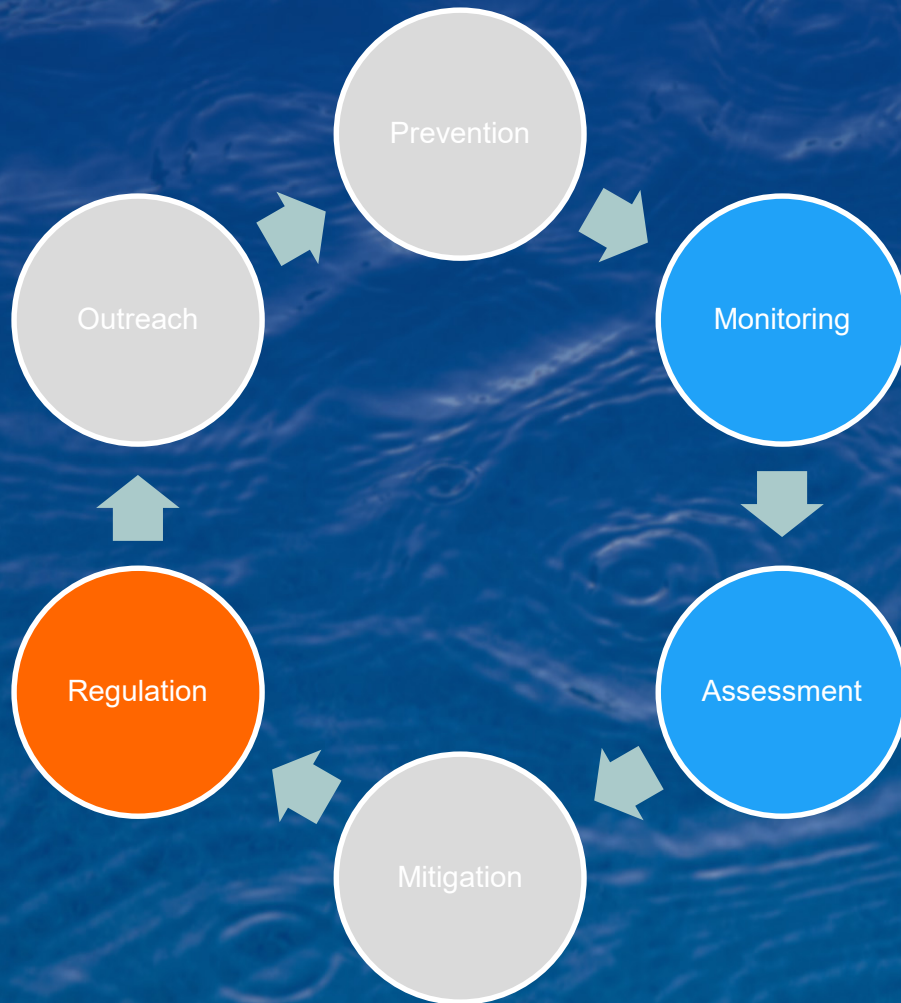
Prevention =
Exercising
Regulatory
Authority

Align Cost with Sources



Product
Manufacturers
are first source
of CECs

Holistic Perspective



Application of
numeric values in
CEC assessments

Liability Concern

Potential impacts
to integrated water
resources

Analytical Methods

Experiences to Date

- Lack of USEPA or Standard Methods and method performance under different conditions
- Analyses are largely driven by university laboratories, which are not conducive in regulatory context (NPDES permits)

Recommendations

- Avoid shifting method development to permittees
- Uncertainty of novel tools needs to be considered in risk evaluation
- Consider how studies are assessed and interpreted with out-of-date methods

Monitoring Approach

Experiences to Date

- Regional inconsistencies
- Difficulty in determining role of ambient monitoring vs. permit-driven monitoring

Recommendations

- Statewide assessment or pilot studies through existing program, like SWAMP
- Product Manufacturers = part of framework
- CEC Priorities = known impacts; developed by dialogue with State/ Regional Water Boards, scientific community, Permittees
- Permittee Level = only where data would inform management action

Impact of “Benchmarks”

Experiences to Date

- Emerging concerns over liability
- Potentially impacting integrated water resources

Recommendations

- Clear parameters for use of any numeric value that is developed
- Consider full context of multiple water resource goals

How Can State Water Board Better Address CECs?

- Focus on prevention (source control) and exercise regulatory authority
- Focus on product manufacturer's role (monitoring, assessment, mitigation)
- Assess CECs statewide through SWAMP
- Consider uncertainty in risk evaluations
- Limit permittee assessments to information that will lead to / inform management actions of known impacts

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CASQA's Vision:

<https://www.casqa.org/about/strategic-plan-vision>