Alameda Countywide Clean Water Program

Contra Costa Clean Water Program

Fairfield-Suisun Urban Runoff Management Program

Marin County Stormwater Pollution Prevention Program

Napa County Stormwater Pollution Prevention Program

San Mateo Countywide Water Pollution Prevention Program

Santa Clara Valley Urban Runoff Pollution Prevention Program

Sonoma County Water Agency

Vallejo Sanitation and Flood Control District

B A S M A A

May 3, 2016

Mary Nichols, Chair
Air Resources Board
1001 I St.
Sacramento, CA 95814

Subject: Comments on the Urban Greening and Green Infrastructure Section of the Natural and Working Lands Discussion Paper

Dear Ms. Nichols:

On behalf of the Bay Area Stormwater Management Agencies Association (BASMAA)[1] thank you for the opportunity to provide comments on the Urban Greening and Green Infrastructure Section of the Natural and Working Lands Discussion Paper. Below are some general comments followed by comments on the discussion topics and questions at the end of the Discussion Paper. The main purpose for our commenting is to point out the many natural linkages between stormwater quality management, transportation planning, greenhouse gas reductions, and climate change mitigation strategies. And having recognized those linkages, to suggest actions that would take advantage of those linkages to effect the goals of California's Climate Change Scoping Plan.

General Comments:

Green infrastructure (GI) has a direct connection with water, both through stormwater capture, treatment, and infiltration, and recharging groundwater and stream flows. GI is also directly connected to transportation as a means of treating polluted runoff from roadways, which are the primary surface conveyance system for stormwater runoff. Transportation infrastructure and vehicles have two primary environmental impacts: 1) air quality impacts through vehicle emissions, and 2) water quality impacts from stormwater runoff. As such, GI should be directly incorporated into both the water and transportation sectors, with sector-specific goals and objectives adopted in regard to GI's connection with both.

Quantitative Targets Questions:

Stormwater management is likely the primary driver for implementing green infrastructure in California in response to municipal stormwater permit mandates adopted by the State and Regional Water Boards. As such, it may be most appropriate to establish targets connected to stormwater management requirements, with secondary targets related to issues such as urban heat island reduction or carbon sequestration. It may be appropriate to establish specific targets for pollutant removal, greened acreage, treated acres of roadway, and/or stormwater volumes captured.

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[1] BASMAA is a 501(c)(3) non-profit organization comprised of the municipal stormwater programs in the San Francisco Bay Area representing 100 agencies, including 85 cities and towns, 8 counties, and 7 special districts. BASMAA focuses on regional challenges and opportunities to improve the quality of stormwater flowing to our local creeks, the Delta, San Francisco Bay, and the Pacific Ocean.

Stormwater management via green infrastructure is already being mandated throughout the state via municipal stormwater permits. Green infrastructure, in the form of Low Impact Development, is mandated for most new and redevelopment projects throughout the state. Municipalities are required to achieve pollutant load reductions, in the form of Total Maximum Daily Loads, via management measures that are frequently GI-based.

For example, municipalities regulated under the San Francisco Bay Regional Water Board's Municipal Regional Permit are required to develop GI Plans designed to achieve 3 kg/year reduction in PCBs discharging to San Francisco Bay by 2040. Local agencies are also mandated to develop Stormwater Resource Plans that identify and prioritize stormwater capture projects in order to compete for voter-approved bond funding. Quantitative targets for stormwater treatment could be developed in coordination with the State and Regional Water Boards to reflect the mandates already in place related to GI. Targets for pollutant reduction, greened acreage, and/or stormwater volumes captured can be connected to funding programs for implementing GI Plans, Stormwater Resource Plans, or Watershed Management Plans.

Targets will likely need to be regional based on the stormwater management mandates set by the State and Regional Water Boards. Regional targets also make more sense for issues like urban heat island reduction, which is likely different region to region.

The appropriate timescale is likely decades, given that it will require costly retrofit of urban infrastructure developed over the past century or more to achieve the targets.

Regarding implementation mechanisms, municipal stormwater mandates are likely the most significant existing mechanism pushing GI implementation; however, stormwater management is also the most under-resourced utility throughout the state due to the constitutional restrictions imposed by Proposition 218 on generating new or increased stormwater fees. As such, programs that support municipal implementation of GI to achieve water quality mandates are key for widespread deployment of GI. One of the most important changes that could be made to support GI implementation is to integrate water and transportation funding streams. Beyond GI implementation on private parcels via new and redevelopment, the primary location in which GI will be implemented is in roadways in the form of green streets. Therefore, funding programs that readily support integrated transportation/GI projects would greatly expedite the rate of GI implementation. The state needs to move beyond "Complete Streets" to "Sustainable Streets." Flexible funding is needed to implement integrated projects – transportation funds won't pay for GI and water quality funds won't pay for bike lanes. If all of the funding the state is directing toward active transportation could include a GI "add-on" from water quality or other sustainability funding sources, it would enable more rapid retrofit of urbanized areas and speed the transition to more sustainable, resilient, walkable, livable communities.

Incentive-based programs or mandates for private development to expand GI implementation into adjacent public rights-of-way may be appropriate. This would encourage more public/private partnerships on stormwater management and blur the lines between public and private stormwater.

Engaging Local Communities through Innovation Question

As stated above, moving communities from the current focus on Complete Streets that address active transportation issues to Sustainable Streets that also incorporate green infrastructure for

stormwater management, urban heat island reduction, improved aesthetics, reduced flooding, etc., would be a significant improvement. Engaging the MPOs in incentivizing the move toward Sustainable Streets with funding awards would help shift the dial. Working with Caltrans to integrate its active transportation programs with its own water quality requirements could lead to more integrated funding opportunities for local agencies. Incorporating GI into Climate Action Planning is another approach. Agencies that already have to implement GI for stormwater permit requirements should include it in their CAPs to show how related climate action benefits.

Land Use Valuation and Co-Benefits

There are several tools available for quantifying the multiple benefits of green infrastructure. The US EPA Green Infrastructure website has a list of cost-benefit analysis tools: (https://www.epa.gov/green-infrastructure/green-infrastructure-cost-benefit-resources).

In particular, the Center for Neighborhood Technology's "The Value of Green Infrastructure" tool (http://www.cnt.org/sites/default/files/publications/CNT_Value-of-Green-Infrastructure.pdf) provides means of quantifying various benefits of GI, but does also highlight that additional research is needed for quantifying things like air pollution uptake of GI. This is an area for which that the Agencies may want to direct resources for additional studies.

Philadelphia also did a triple-bottom line assessment of GI approaches in comparison to traditional grey infrastructure which provides useful information in quantifying the multiple benefits (https://www.epa.gov/sites/production/files/2015-10/documents/gi_philadelphia_bottomline.pdf).

Thank you again for the opportunity to comment. If you have any questions, please contact me at 650-599-1419 or our Executive Director, Geoff Brosseau at 650-365-8620.

Sincerely,



Matt Fabry, Immediate Past Chair
Bay Area Stormwater Management Agencies Association

cc: Bruce Wolfe, Executive Officer, San Francisco Bay Regional Water Board
Tom Mumley, Assistant Executive Officer, San Francisco Bay Regional Water Board
Keith Lichten, Watershed Management, San Francisco Bay Regional Water Board
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BASMAA Board of Directors