APPENDIX L

Comprehensive Benefits Analysis of Water Quality Improvement Plan Strategies

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Final Technical Memorandum

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Summary

The City of San Diego Storm Water Division ("Division") is developing Water Quality Improvement Plans (WQIPs) that consist of a range of structural and nonstructural strategies for meeting TMDL regulatory requirements in each watershed. However, the Division recognizes that these strategies differ with respect to their contribution to "additional" or "other" benefits to the local community, environment, and economy that are beyond specific water quality improvements in streams. This assessment has been implemented to provide the Division with supplemental information on these potential benefits. The Division aims to consider these other benefits in selecting strategies only in cases when strategies yield the same level of water quality improvements but which may produce markedly different levels of other benefits.

This document outlines a framework for assessing other benefits from these strategies. The framework assesses how each type of strategy could impact one or more types of other benefits. These additional benefits consist of various types of changes beyond water quality improvements in terms of environmental resources, quality of life, property values, business development, and others.

In the WQIPs, individual strategies are grouped into a series of categories that are defined as either 'Nonstructural' or 'Structural.' Over 20 categories of strategies have been defined based on their similarity in how they can improve water quality and include *Development Planning*, *Construction Management*, *Existing Development*, *Illicit Discharge*, *Detection, and Elimination (IDDE) Program*, *Public Education and Participation*, and *Enforcement Response Plan*.

The framework for assessing the potential for additional benefits from strategies has several dimensions including::

- *Strategy Categories* are defined by how they influence water quality improvements (see Section 2). There are three Structural and four Nonstructural types of strategy categories including.
  - *Structural Strategies*, as defined in the WQIP include: (a) Green infrastructure, (b) multi-use treatment areas, or (c) water quality improvement BMPs
  - *Nonstructural Strategies,* as defined in this assessment based on how these strategies aim to: (a) Improve Structural Systems Performance, (b) Increase the Number of Structural Systems, (c) Change Behavior; or (d) Reduce Pollutants Directly.
- *Benefit Categories* include a range of economic, social and environmental outcomes. This assessment determines the relevance and impact of each strategy category on a benefit category (see Section 3).

- *Impact Levels* of a strategy category in a benefit category is classified as either (a) monetizable, (b) measurable, (c) potential, or (d) not applicable. (See Section 3). These impact levels are indented to provide *order of magnitude* information about the potential impact of a strategy on each type of benefit.

- A scoring system is established for the magnitude of benefits evaluation to compare different strategies (see Section 3). In addition, the total number of applicable benefits is provided for additional information about the relative advantage of different strategies.

A discussion and rationale for assessing the level of impact for a given strategy on a benefit category is provided in Section 4. This assessment is intended to be an initial, order of magnitude of benefits of different strategies. It can only be an illustrative assessment since details on the design and location of any individual strategy is not available at this stage. The framework however is intended to indicate how and to what degree benefits could be estimated once a strategy is in place. As an order of magnitude assessment, strategies with measurable and monetizable would be expected to exhibit successively higher levels of estimable benefits compared to strategies that are classified as only having a potential connection to benefits.

The results, as presented in Section 5, indicate that structural strategies (especially, Green Infrastructure and Multiuse Treatment Areas) have the highest potential to generate sizable benefits. However, a number of nonstructural strategies (e.g. Initiatives to Change Behavior for Existing Development, Priority Development Projects, Construction Management, Public Education and Enforcement, among others) could also provide additional benefits. Many other non-structural strategies have the potential to generate a wide range of different benefits for the community.

A cross-cutting theme in this assessment is the impact of strategies on property values and business development. Some strategies, such as ones that foster on-site water retention and reduction of street debris, have the potential to provide tangible and intangible benefit to communities and local businesses by reducing water and clean-up costs and providing an overall improved aesthetic environment. Depending on where and how a strategy is implemented, benefits can be higher or lower. The literature review in Appendix 1 discusses cases where these benefits have measured.

A next step for this assessment would entail site-specific evaluations of strategies and potential additional benefits of WQIP at a planning level. As strategies become more defined and specific data becomes available on project conditions, this framework could be adapted further to create more detailed results for prioritizing strategies. This step would include applying current research to site specific projects to more direct monetize and quantify the outcomes of strategies in terms of cost savings and property value enhancements. Better still would be a pre- and post-monitoring program to assess the singular and combined effects of strategies to different stakeholders.

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Acronyms and Abbreviations

Acronym or Abbreviation	Definition
ac	Acres
BCA	Benefit Cost Analysis
BES	Bureau Of Environmental Services
BMP	Best Management Practice
Btu	British Thermal Unit
CAMX	California-Mexico Power Area
CEA	Cost-Effectiveness Analysis
CLRP	Comprehensive Load Reduction Plan
CNT	Center For Neighborhood Technology
CO2	Carbon Dioxide
CSO	Combined Sewer Overflow
DOT	Department Of Transportation
EIA	Economic Impact Analysis
EPA	Environmental Protection Agency
GHG	Greenhouse Gas
GI	Green Infrastructure
HOA	Home Owner's Association
IDDE	Illicit Discharge, Detection, And Elimination
kWh	Kilowatt Hour
LACDPW	Los Angeles County Department Of Public Works
LID	Low Impact Development
M Wh	Mega Watt Hour
MMSD	Milwaukee Metropolitan Sewage District
MODA	Multi-Objective Decision Analysis
MS4	Municipal Separate Storm Sewer System
NOx	Nitric Oxide And Nitrogen Dioxide
NPV	Net Present Value
NRDC	Natural Resources Defense Council
O&M	Operations And Maintenance
O3	Oxide
PDP	Priority Development Projects
PFC	Permeable Friction Course
PGA	Pollutant Generating Activities

Acronyms and Abbreviations (continued)

Acronym or Abbreviation	Definition
PM	Particulate Matter
PWD	Philadelphia Water District
QMRA	Quantitative Microbial Risk Assessment
SO2	Sulfur Dioxide
SPU	Seattle Public Utilities
SROI	Sustainable Return On Investment
TBL	Triple Bottom Line
TIGER	Transportation Investment Generating Economic Recovery
TMDL	Total Maximum Daily Load
UTC	Urban Tree Canopy
WAMP	Watershed Asset Management Plan
WERF	Water Environment Research Foundation
WQIP	Water Quality Improvement Plan

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1 Introduction

The City of San Diego Storm Water Division (Division) has prepared many potential strategies as part of its Water Quality Improvement Plan (WQIP). These strategies have identified a range of structural best management practices (BMPs) (e.g., a constructed runoff reduction system, such as a bio-swale), and nonstructural BMP activities (e.g., programs that promote installation of constructed systems, or reduce pollutants directly through education and outreach). This memo seeks to assess the potential for strategies to generate "additional" or "other" benefits beyond water quality improvements. The Division seeks such information to contribute to prioritization of strategies that meets regulatory requirements and generates the best value for the community and local businesses.

The concept for evaluating the other benefits of proposed strategies has been under discussion since April 2014. A technical memo was developed as an initial task to classify additional benefits from the Division's stormwater management strategies. That memo is contained in Appendix 1 and includes a literature review of potential benefit categories and case studies of green infrastructure program benefits. The economic framework was presented to stakeholders at a meeting on May 20, 2014. Feedback was elicited during and after that meeting, and has been incorporated into this document and to the Division's current approach to evaluating strategies (see presentation, handout, and comments from workshop in Appendix 2).

The next several sections in this document present the approach and draft evaluation of additional benefits. The evaluation has been applied to a comprehensive list of strategies from the City's three draft WQIPs (Mission Bay, Los Peñasquitos, and San Dieguito). The framework entails the characterization of strategy categories by type of impact (Section 2), definition of potential types of benefit categories (Section 3) and a classification of benefits for each strategy category (Section 4). Results of this evaluation are contained in Section 5.

This assessment of additional benefits of WQIP strategies is conducted for initial planning purposes only. As strategies become more defined and specific data becomes available on project conditions, this framework could be adapted further to create more detailed results for prioritizing strategies. This step would include applying current research to site specific projects to more directly monetize and quantify the outcomes of strategies areas such as recreational, property value and business development benefits.

2 Strategy Classifications

The WQIP identifies a number of strategy categories as either "Nonstructural" or "Structural", and in terms of whether they are Jurisdictional Strategies or Optional Jurisdictional Strategies. Optional strategies are those strategies that may be triggered in the future to achieve the interim and final numeric goals." In the analysis of benefits, the main distinction is between Nonstructural or Structural types which are defined in the following ways.

Nonstructural Strategies include "those actions and activities intended to reduce storm water pollution, which do not involve construction of a physical component or structure to filter and treat storm water." Individual strategies are grouped into over 25 different categories including: *Development Planning*, *Construction Management*, *Existing Development*, *Illicit Discharge, Detection, and Elimination (IDDE) Program*, *Public Education and Participation*, *Enforcement Response Plan*, and *Non-JRMP Strategies*. For each watershed, a list of potential nonstructural strategies has been developed that reflect the needs, opportunities and constraints in different locations. In general, many of these initiatives have been implemented by the Division for many years and are integral to regulatory compliance on a watershed-specific basis.

Nonstructural strategy categories are further defined in this assessment by *how* they improve water quality, which in turn indicates how they may generate other benefits. For example, four types of mechanisms include the ways in which strategies:

- ***Improve Structural Systems Performance:*** These include strategies that relate to new design standards and performance monitoring would be measured by the improvement in the performance of installed structural systems. The benefits of these nonstructural strategies would ultimately draw from the benefits of structural systems that are implemented.
- ***Increase the Number of Structural Systems*****:** These strategies aim to increase the rate of BMP adoption is due to training in the community or general promotion of BMPs, lead to benefits whenever they are installed. The outcome of these strategies then depends on the number of *additional* systems that are installed.
- ***Change Behavior*****:** These strategies target efforts to encourage improved environmental stewardship and storm water protection by residents and businesses throughout the community. Various types of actions that people may take who become more aware of environmental impacts through these strategies include adoption of rain barrels, reducing litter, and reducing unnecessary levels of pesticides, herbicides and fertilizers.
- ***Reduce Pollutants Directly:*** These strategies include those that aim to directly control pollution through actions that the Division and other public agencies can take independently, such as internal training, enforcement and administrative changes. These strategies can lead to behavior change by individuals but initially through a focus on public entities.

Structural Strategies, in contrast to Nonstructural strategies, are physical infrastructure that are designed for site-specific conditions and placed strategically across a watershed to improve water quality. The effectiveness and feasibility of implementing any of these BMPs varies depending on their design and site conditions. For example, the effectiveness of a BMP for enhanced infiltration capacity of a watershed depends on amenable soil types. Other site-specific considerations include the physical land area available for effective implementation and maintenance. Also, the capital and maintenance costs of a BMP influence its feasibility for the Division, especially in comparison to other BMPs which can be implemented more cost-effectively. The structural strategies that have been identified as potentially suitable for San Diego watersheds and have been classified as one of three types: (1) green infrastructure, (2) multiuse treatment areas, and (3) water quality improvement BMPs.

- ***Green Infrastructure*** covers a range of BMPs that are designed to be integrated in a broader site plan to maintain healthy waters, provide multiple environmental benefits, and support sustainable communities. Green infrastructure is distinguished from other methods by making deliberate and effective use of vegetation and soil to manage storm water.

- ***Multiuse Treatment Areas*** in the Water Quality Improvement Plan are identified as large-scale treatment areas such as multiuse basins and stream, channel, and habitat rehabilitation projects. These systems are designed as regional facilities that can receive flows from neighborhoods or larger areas and become cost-effective solutions that provide multiple benefits. For example, such systems can be integrated in public spaces, such as soccer fields and parks, which provide recreational areas and flood control, ground water recharge, restoration, habitat enhancement, and recreation. In addition stream bank projects that reduce erosion can improve water quality and simultaneously improve habitat.

- ***Water Quality Improvement BMPS*** include systems that supplement the design performance of existing infrastructure. For example, systems that segregate trash includes inlet devices, such as trash guards or racks that capture debris before they enter surface waters. Another example are proprietary commercial products that often aim to use settling, filtration, absorptive/adsorptive materials, vortex separation, and sometimes vegetative components to remove pollutants from runoff. Finally, dry weather flow separation and treatment projects target non-storm water dry season flows and divert these flows for treatment either on-site or to sanitary sewer systems and ultimately wastewater treatment plants.

Overall, 30 different groups of strategies have been classified as either “Jurisdictional” (strategy types numbered 1-23, in Table 2 and Table 6 or “Optional Jurisdictional” (strategies types numbered 24-30, in Table 3 and Table 7). Optional strategies are those strategies that may be triggered in the future to achieve the interim and final numeric goals." The number ordering for these strategies follows from documents provided by the Division and reflects the most comprehensive list of current strategies under consideration. Specific strategies have also been identified by the Division within each strategy group.

3 Benefit Categories and Levels of Impact

Stormwater management strategies can generate various types of benefits and have different levels of impact. Economic research has shown that stormwater management strategies can generate a range of benefit categories with economic, environmental and social impacts for the local residents, businesses, and public agencies. The level of impact of a strategy can differ across benefit categories and depends on the design of the strategy, site conditions where the strategy is implemented, and characteristics in the community. Estimation of economic benefits from a strategy depends on the degree to which linkages can be quantified between strategy and a benefit category and then available economic literature to value this change. In some cases, only a part of the link between a strategy and a benefit category can be quantified (e.g. the volume of water retained by a green infrastructure system can be measured, but not its impact on stream bank stabilization).

3.1 Description of Benefit Categories

This section below discusses a number of benefit categories that are found in economic literature. They are grouped by financial, environmental and social dimensions. A broader discussion from the literature is contained in the Appendix 1.

Financial Benefits

- ***Water Cost Savings:*** This type of benefit could occur when potable water needed for landscaping, washing or other property maintenance is reduced. Green infrastructure strategies could enable such savings if water retention reduces water demand, or some part of the system improves irrigation efficiency. The reduction in demand lowers water costs. These savings could be quantified and monetized if the volumes of water retained at a site can be measured.
- ***Energy Cost Savings:*** Green infrastructure can generate energy cost savings in several ways. For example, buildings which are adjacent to trees or which install green roofs can benefit from lower the heating and cooling energy costs because of shading and insulation, respectively. Some research suggests that if such green infrastructure system were installed throughout a city, the overall ambient temperature would decline and which would in turn reduce cooling loads for other buildings. Finally, in cases when green infrastructure provides water storage that lowers pumping costs, there would be a corresponding reduction in energy costs.

Environmental Benefits

- ***Flood Risk Reduction:*** Reduced runoff in an urban watershed can reduce the frequency and severity of flooding in downstream neighborhoods in some cases. The magnitude of these benefits though depends on if such a neighborhood is downstream and on the design and scale of a strategy that reduces flooding. Other factors include rainfall conditions, soil characteristics, slope, elevation and watershed characteristics. A first step in quantifying the potential for flood risk reduction benefits requires an understanding how much water is retained.

- ***Air Particulate Entrapment:*** Some green infrastructure systems can trap airborne pollutants, such as particulate matter (e.g. PM10), directly from the environment on their leaves and in turn reduce adverse human health impacts.[1] The total amount of particulate trapping depends on the type of vegetation, and local climate conditions. For trees, the US Forest Service published a report that provides benchmark values for use in calculations.[2] This type of benefit can be quantified and potentially monetized based on the amount and type of plants.

- ***Climate Impacts:*** Carbon sequestration is a natural process in which plants store carbon in biomass and soils as they grow. When atmospheric carbon dioxide is taken up by trees, grasses, and other plants, it can reduce greenhouse gas effects on the planet. The amount of carbon that can be sequestered by a green infrastructure system depends on the above ground quantity of biomass of the tree, green roof or bio-swale. Economic valuation of climate change effects can be used to monetize carbon sequestration.

- ***Habitat Related Benefits:*** Green infrastructure that can provide habitat benefits include strategies that create new habitat areas, or improve existing ones. For example, vegetated infiltration systems can improve the habitat for flora and fauna, birds, and insect species. These different types of habitats are usually small in size and have limited impacts. Greater benefits may arise from large-scale strategies that enhance habitat connectivity in existing corridors. This type of benefit is readily quantified based on the acreage and plantings at a green infrastructure site, or stream bank stabilization effects, but more difficult to monetize because of limitations in economic research.

- ***Air Quality Emission Reduction:*** The total amount of reduction in criteria air contaminant emissions, such as particulate matter, from a power plant is directly tied to the reduction in energy use as discussed above. Energy savings are readily converted to its emission rate reductions by utilizing data from EPA and other public sources. Reduction in air pollution would generate health-related benefits for people. This benefit can be quantified and monetized if information is available on the amount of water and energy reduced at a treatment facility.

- ***GHG Emission Reduction:*** Similar to air quality emission reductions, energy demand reduction also reduces greenhouse gas emissions. The tons of greenhouse gas emissions are computed from the same data sources as criteria air contaminants. The economic damage caused by greenhouse gas emissions are broadly related to changes in productivity and damage costs.

[1] Center for Neighborhood Technology, The Value of Green Infrastructure. 2010

[2] http://www.fs.fed.us/psw/programs/uesd/uep/products.shtml

Social / Community Benefits

- ***Property Value Enhancement:*** Green infrastructure and other strategies can lead to enhanced property values under a variety of circumstances. For example, strategies that improve the overall visual appearance of a community simply by having planted material, street trees and bioswales among impervious surfaces have been shown to enhance value of nearby properties. In addition, some BMPs strategies aim to directly reduce litter or debris from public spaces to make it more visually appealing. These effects improve the overall quality of life in those neighborhoods. Benefits can be quantified by measuring the number of properties that are adjacent to the green infrastructure. Monetization of the effect would depend on the applicability of economic research on a site specific basis.

- ***Recreational Benefits:*** Certain green infrastructure strategies provide recreational benefits if they facilitate pedestrian, bicycle use, or connect to an existing recreational corridor or trails. Benefits would be monetized by the number of participants in a recreational activity at a site and their value per use. Other quantitative measures include the number and type of design features that offer recreational options.

- ***Business Development & Jobs:*** Green infrastructure, such as comprehensive green street designs, and initiatives to reduce street debris can lead to an enhanced sense of place, and increase in foot traffic that can support retail activity. Additionally, spending on capital investments and operations and maintenance (O&M) leads to job creation. This benefit can be measured by assessing the number of jobs created in an area where a green infrastructure strategy is implemented. In addition, these jobs can be associated with wider economic development benefits.

- ***Crime Reduction:*** Research suggests that fewer crimes occur near buildings with trees and non-invasive vegetation. Maintained areas of vegetation encourage informal social gatherings outdoors. Incidence of crime declines when with the presence of people and possibly by psychological precursors to crime.

- ***Public Education/ Environmental Stewardship:*** Promoting strategies that seek to change people's behaviors and make them more aware of their environmental impacts helps to cultivate a *stewardship perspective* in the community about its local natural resources. Quantification of this type of benefit may be measured in terms of how many people are reached with messages of programs aimed to enhance knowledge and ultimately actions towards to improve stormwater management.

- ***Heat Island Effect:*** Trees and other vegetation can reduce ambient temperatures in cities that have higher air temperatures. Lower temperatures can reduce health effects especially in populations that are at risk of heat stroke. Additionally, the overall lowering of temperatures can reduce cooling needs at properties located within the area. This type of benefit is only quantifiable in cases where the strategy is applied over a large scale.

- ***Noise Reduction:*** Some green infrastructure systems, such as wetlands or trees, are effective in reducing ambient noise because they can absorb it. This is also true for porous concrete and green roofs, but there is limited research in quantifying these benefits.

3.2 Characterization of the Benefit Level from a Strategy

The potential magnitude of benefits differs across strategy types. To account for these differences, four 'levels' are defined that represent a decreasing association between the impact of a strategy and a benefit category. These levels include:

Monetizable – The level of benefits indicates impacts that can be quantified and where economic research has been produced to determine a monetary value.

Measurable – There exists a connection for some measure of non-monetary impact can be identified and measured, even if economic research is not available to monetize the impacts.

Potential - A conceivable connection exists between a strategy and benefit category but it is not likely to be measurable.

Not Applicable - There is no discernible connection between a strategy and benefit category.

At this stage in program implementation and project design, the impact of each strategy on a benefit category can only be considered to be an order of magnitude assessment. An estimation of the actual impact would be highly uncertain since most strategies currently lack site-specific data about the design and implementation. Instead, these levels of impact are intended to provide separable categories that indicate the order of magnitude of benefits that a strategy may be able to generate. That is, it is only possible to assess the likelihood that a project can generate monetizable benefits, not the actual size of monetizable benefits.

At the same time, these four categories are intended to provide a broad degree of separation between strategies in terms of their measurable connection with each benefit category. For instance, if a strategy can be classified as having monetizable benefits, then its overall level of measurable benefits can be reasonably assumed to be higher than another strategy that is classified as being quantifiable, even if only in part. By the same rationale, these classifications would likely have more direct impact for a benefit category than a strategy whose impact can only be presumed

This assessment aims to achieve consistency in evaluations within a specific strategy outcome group, as well as across strategy outcome groups. While some strategies have design or location specifications (e.g., total acres of bioretention), or target certain groups (developers vs. residential), others entail broad descriptions. Due to this uncertainty, the evaluation has taken a conservative approach to drawing conclusions about the magnitude of benefits that could arise from a strategy.

3.3 Scoring System

A scoring system is established to support comparisons of strategies with respect to the potential benefits they can generate (see Table 1). Each benefit level is assigned a point value that has been established through discussions with the Division. The values are intended to provide an indication of the strategy's impact across all benefit categories. In this case, potentially monetizable benefits are assigned a higher score than one that is only quantifiable (and not monetizable). This approach is intended to separate the types of benefits that are likely to be larger in magnitude from others that cannot be monetized nor quantified.

Table 1. Overview of Benefit Scoring

Level	Description	Point Value
Monetizable	Strategy can realize quantifiable impacts, and sufficient economic evidence supports placing a dollar value on these impacts.	1
Measurable	Strategy can realize quantifiable impacts, but lacks sufficient economic evidence to support placing a dollar value on these impacts.	0.667
Potential	Strategy most likely provides a positive impact, but the magnitude of the impact is uncertain.	0.333
Not Applicable	Strategy will not impact the benefit category in any meaningful way.	0

This scoring system places higher weight on strategies which may generate benefits that can be monetized (3 times the weight of a potential benefit level). Accordingly, in some cases a strategy that influences many additional benefit categories at a "*Potential"* level could score lower than one with fewer categories but with "*Monetizable"* impacts. This scoring system is designed for that type of result to give greater emphasis on strategy impacts that can be measured and are thus more tangible. Potential impacts are circumstantial and small, as compared to more significant impacts that can be measured and monetized. Furthermore, the implications of this scoring system have been taken into account in a consistent approach in determining which impacts of strategy are classified as monetizable, measureable or potential.

This scoring system is applied to the strategies in Table 2 through Table 7. This scoring system is only relevant for comparing strategies with respect to additional benefits, not in ways that influence a ranking towards meeting permit requirements and/or encourages other program objectives such as habitat restoration.

In addition, the total number of applicable benefit categories is also shown in Table 2 through Table 7 for additional reference on the impact of these strategies.

4 Framework for Assessment of Strategies

Determination of the applicability of benefits for each strategy depends primarily on the assignment of a strategy to one of the structural or nonstructural categories (defined in Section 2). Consistency in the applicability of a benefit category (defined in Section 3) for a strategy is maintained by jointly evaluating all strategies of a specific type. This section discusses the framework for assessing potential additional benefits that can arise from the implementation of each strategy. The aim of this exercise is to apply a consistent and transparent rationale for each strategy. Since available evidence is limited with respect to each strategy, the application of a consistent set of assumptions to each strategy underlies the basis for determining (a) which benefit categories are applicable, and (b) the potential magnitude of benefits, if a category is applicable.

The approach to assigning a magnitude level began with an assessment of the strategy for which the most information is available about its potential impact: Green Infrastructure (Ref 19). This type of strategy is used as a benchmark for assigning benefit categories and potential magnitudes of benefits due to the availability of evidence from projects implemented elsewhere in the U.S. To illustrate this approach for Green Infrastructure (Ref 19), consider the rationale below:

- In some cases, sufficient information available about the specific strategies specifies the area of bioretention and permeable pavement to be installed and the location of the project. Due to the size of these initiatives, and knowing that the vegetation can improve air quality through the uptake of criteria pollutants and improve the climate through carbon sequestration, it is assumed that the total pollutant and CO2 removal from the atmosphere can be quantified. These quantified amounts of pollutant and CO2 can then be monetized using standard practices that are currently being used to value these impacts.
- Additionally, it is assumed that these projects will provide aesthetic improvements to the existing site, which can be quantified with information regarding the number of properties within a certain radius and the property value changes.
- These sites will also need to be maintained, which will require spending on jobs, and depending on the specific site location, the improved aesthetics can also improve businesses located near the site.
- The total land area of the bioretention and permeable pavement will allow for quantifying the amount of rain water which gets absorbed onsite, and does not cause localized flooding, where applicable.
- The remaining other benefit categories are assumed to see positive impacts. For example, GHG emission reductions may occur from the lifecycle CO2 emissions for permeable pavement being lower than the lifecycle CO2 emissions of asphalt or pavement. However, there is not enough information at this time to accurately quantify that impact.

- Similarly, permeable pavement absorbs less heat than conventional pavement, which is a benefit for Urban Heat Island reduction. The amount of heat, and how that will affect public health cannot be quantified.

The potential impacts of all other strategies have been evaluated relative to the benchmark as established by the above assumptions for green infrastructure. As an example, the first group of strategies evaluated below, All Development Projects (Ref 1). focuses on improving existing systems performance. It is assumed that specific actions, such as administrative training or increased monitoring, will have positive impacts for the same benefit categories as a green infrastructure project. But since there is no way to quantify any of those impacts, the magnitude of benefits is assumed to be lower.

The remainder of this section discusses the assessment of Jurisdictional and Optional Jurisdictional Strategies. Note that these strategies represent the latest consideration in an evolving process of identification, specification and assessment. Not all strategies have been implemented or have plans for immediate implementation. At the same time, the specification of the design standards also varies from strategy to strategy. This assessment takes into account the *potential* benefits that may occur, given the information available, and assumptions that are listed in each strategy.

4.1 Jurisdictional Strategies

This section discusses the rationale and methodology for assigning scoring categories to the Jurisdictional Strategies, based on the most recent description of the strategy. This list of individual strategies has been grouped according to the same categories that are proposed for the draft WQIPs and are presented in the same chronological order. The information found in the parenthesis next to the strategy group name (*Ref X*), refers to the number in the far left columns of Table 2 and Table 6. Note that in some cases (e.g., Commercial, Industrial, Municipal, and Residential Facilities and Areas) the strategies are separated into two types (i.e., Improve Structural Systems Performance and Initiatives to Change Behavior) based on the specific ways in which a strategy creates benefits.

4.1.1 All Development Projects (Ref 1)

Strategies in this group consist of administrative and other tasks that center on improving the structural system's performance. Many of these types of strategies focus on broad initiatives such as training or source control. The list of strategies includes the following:

- Administer a program to ensure implementation of source control BMPs to minimize pollutant generation at each project and implement LID BMPs to maintain or restore hydrology of the area, where applicable and feasible.
- Investigation and research of emerging technology.
- Train staff on LID regulatory changes and LID practices.
- Amend municipal code and ordinances, including zoning ordinances, to facilitate and encourage LID opportunities. Ensure consistency with the City of San Diego's BMP Design Manual.

- Develop and implement Green Infrastructure Program and Guidelines.
- Develop Design Standards for Public LID BMPs.
- Create Right-of-Way Design Manual.

In scoring these strategies, it is assumed that the programs that target the administration or enforcement of BMPs would mostly affect the same benefit categories as a Green Infrastructure (GI) project which increases the acres of bioretention, but on a smaller scale. It is assumed that these projects would generate a positive impact but due to the uncertainty of the implementation and magnitude of the effect of these strategies, it cannot be measured.

Some of the broad initiatives are deemed to have too much uncertainty to reasonably assign a specific benefit level. It is however reasonable to assume that overall public awareness and knowledge of the issue will increase.

4.1.2 Priority Development Projects (PDPs) (Ref 2)

Similar to the strategies in the All Development Projects section, PDP initiatives are assumed to increase the number of structural systems and improve existing structural systems. These strategies include the following:

- For PDPs, administer a program requiring implementation of on-site structural BMPs to control pollutants and manage hydromodification. Includes confirmation of design, construction, and maintenance of PDP structural BMPs.
- Update BMP Design Manual procedures to determine nature and extent of storm water requirements applicable to development projects and to identify conditions of concern for selecting, designing, and maintaining appropriate structural BMPs.
    - Amend BMP Design Manual for trash areas. Require full four-sided enclosure, siting away from storm drains and cover. Consider the retrofit requirement.
    - Amend BMP Design Manual for animal-related facilities, such as such as animal shelters, "doggie day care" facilities, veterinary clinics, breeding, boarding and training facilities, groomers, and pet care stores.
    - Amend BMP Design Manual for nurseries and garden centers.
    - Amend BMP Design Manual for auto-related uses.
- Administer a program to inspect and enforce updated BMPs in BMP Design Manual
- Develop and administer an alternative compliance program to on-site structural BMP implementation (includes identifying Watershed Management Area Analysis [WMAA] candidate projects).

Scoring the impact of programs that target the administration or enforcement of BMPs would mostly affect the same benefit categories as a green infrastructure project which

increases the acres of bioretention, but on a smaller scale. Initiatives that focus on updating various components of the design manual are assumed to increase the efficiency of the already existing systems. However, the total magnitude of this improvement cannot be estimated without additional information, and thus other benefits for this group cannot be measured.

4.1.3 Construction Management (Ref 3)

There is one specific strategy under this group, and it is assumed it will improve structural system performance. Construction Management strategy is:

- Administer a program to oversee implementation of BMPs during the construction phase of land development. Includes inspections at an appropriate frequency and enforcement of requirements.

The scoring for this strategy is assumed to be the same as previously discussed strategies that improve the performance of existing systems.

4.1.4 Commercial, Industrial, Municipal, and Residential Facilities and Areas – Improve Structural Systems Performance (Ref 4)

The specific initiatives under this strategy group focus on improving structural systems performance. These strategies differ from the strategies in the next group, which also are included under Commercial, Industrial, Municipal, and Residential Facilities and Areas in the Water Quality Improvement Plan, but target a different outcome. Administering programs which require minimum BMPs are assumed to affect the same benefit categories as a GI project which increases the acres of bioretention, but a smaller scale. These strategies include:

- Administer a program to require implementation of minimum BMPs for existing development (commercial, industrial, municipal, and residential) that are specific to the facility, area types, and PGAs, as appropriate. Includes inspection of existing development at appropriate frequencies and using appropriate methods.
    - Update minimum BMPs for existing residential, commercial, and industrial development. Specific updates to BMPs include require sweeping, catch basin cleaning and maintenance of private roads and parking lots in targeted areas.
    - Power-washing minimum BMPs: Outreach to property managers and trash haulers to elevate the emphasis of washing as a pollutant source. Emphasize non-compliant washing as an enforceable violation.
    - Implement property based inspections.
    - Review policies and procedures to ensure discharges from swimming pools meet permit requirements.

Strategies that target pollutants directly, such as the power-washing minimum BMPs, can be assumed to reduce the amount of pollutants entering the environment. However, while these strategies protect habitats and improving aesthetics, the total amount of pollutants reduced cannot be measured until more information is known regarding the current level of pollutant discharges, and how many people are targeted as part of this initiative. These initiatives are assumed to require some level of public outreach or promotion, and public awareness of these issues will be raised.

4.1.5 Commercial, Industrial, Municipal, and Residential Facilities and Areas – Initiatives to Change Behavior (Ref 5)

While also focusing on Commercial, Industrial, Municipal, and Residential Areas, these strategies seek to initiate changes in behavior. This list includes:

- Implement pet waste program
- Consider installing trash bins, pet waste bag dispensers and pickup services on Rose Creek Bicycle Path and Rose Canyon Bicycle Path.
- Promote and encourage implementation of designated BMPs for residential and non-residential areas.
- Residential BMP: Rain Barrel.
- Residential and Commercial BMP: Grass Replacement.
- Residential and Commercial BMP: Downspout Disconnect.
- Residential and Commercial BMP: Microirrigation.
- Onsite Water Conservation Survey.

These types of initiatives can also lead to measurable impacts. Specifically, initiatives which encourage water conservation allow for quantification if a simple number of variables are known, such as the number of Rain Barrels, and average annual rainfall.

4.1.6 MS4 Infrastructure (Ref 6)

The specific strategy initiatives for MS4 Infrastructure focus on improving the structural systems performance. The list of MS4 Infrastructure Strategies includes:

- Implementation of operation and maintenance activities (inspection and cleaning) for MS4 and related structures (catch basins, storm drain inlets, detention basins, etc.) for water quality improvement and for flood control risk management.
    - Optimize catch basin cleaning to maximize pollutant removal (4 times per year for metals and sediment TMDLs, elsewhere 1 per year).
    - Increased frequency of catch basin inspection and as-needed cleaning (Settlement Agreement).

- Proactively repair and replace MS4 components to provide source control from MS4 infrastructure.

- Implement controls to prevent infiltration of sewage into the MS4 from leaking sanitary sewers.
- Identify sewer leaks and areas for sewer pipe replacement prioritization.

Since these projects specifically focus on sub-surface activities, it is assumed that other benefits associated with changes above ground are not affected. Due to the specificity of these initiatives, it is reasonable to assume they will have a positive impact on local flood risk reduction, which in turn could potentially affect habitat related benefits, and possibly aesthetics.

4.1.7 Roads, Street, and Parking Lots (Ref 7)

These strategies specifically target street litter or debris will create aesthetic improvements. These strategies include:

- Implement operation and maintenance activities for public streets, unpaved roads, paved roads, and paved highways.
- Outreach to street sweeping enhancement-targeted areas.
- Enhance street sweeping through equipment replacement (replace every 4 years) and route optimization (sweep all areas twice a month).
- Initiate sweeping of medians on high-volume arterial roadways.
- Implement additional street sweeping near commercial routes adjacent to maintained MS4 channels..

The impact of these strategies can be quantified by estimating the volume of litter and street pollutants removed. Also, depending on the local land-use for the streets targeted, it is conceivable that a cleaner environment can lead to business development and investment. Jobs then would be supported by the money spent on operation and maintenance activities.

4.1.8 Pesticide, Herbicides, and Fertilizer BMP Program (Ref 8)

This category includes a broad initiative to reduce pollutant loads. The strategy entails:

- Require implementation of BMPs to address application, storage, and disposal of pesticides, herbicides, and fertilizers on commercial, industrial, and municipal properties. Includes education, permits, and certifications.

While there is too much uncertainty at this time to be able to assign specific measurable benefits, this reduction in pollutants entering the environment will benefit habitats, and aesthetics. It is assumed that overall public awareness and knowledge of the issue will increase.

4.1.9 Retrofit and Rehabilitation in Areas of Existing Development – Improve Structural Systems Performance (Ref 9)

The goal of this strategy is to improve existing systems, specifically:

- Develop and implement a strategy to identify candidate areas of existing development appropriate for retrofitting projects and facilitate the implementation of such projects.

As this strategy focuses on retrofitting, is assumed to follow the same methodology for scoring other projects which increase the number of structural systems.

4.1.10 Retrofit and Rehabilitation in Areas of Existing Development – Increase the Number of Structural Systems (Ref 10)

This strategy was separated from the previous as it focuses on rehabbing existing ecological areas.

- Develop and implement a strategy to identify candidate areas of existing development for stream, channel, or habitat rehabilitation projects and facilitate implementation of such projects.

Specific improvements in streams and other systems will improve habitats and aesthetics and can be measured using the area of each project.

4.1.11 Illicit Discharge, Detection, and Elimination (IDDE) Program (Ref 11)

This program is assumed to change behavior, specifically, reduce pollutants entering the environment through illegal discharges and disposal. The strategy is defined as:

- Implement Illicit Discharge, Detection, and Elimination (IDDE) Program per the JRMP. Requirements include: maintaining an MS4 map, using municipal personnel and contractors to identify and report illicit discharges, maintaining a hotline for public reporting of illicit discharges, monitoring MS4 outfalls, and investigating and addressing any illicit discharges.

While broad strategies cannot be measured, it is assumed that the targeting of pollutants will improve the environment and benefit habitats and aesthetics. It is also assumed that overall public awareness and knowledge of the issue will increase.

4.1.12 Public Education and Participation: Initiatives to Change Behavior (Ref 12)

Strategies under Public Education and Participation are grouped under two categories, those which seek to change behavior, and are targeted at the community at large, and those which seek to reduce pollutants directly, by targeting business and industries. The strategies in this grouping target changing behavior, and are listed below:

- Implement a public education and participation program to promote and encourage development of programs, management practices, and behaviors that reduce the discharge of pollutants in storm water prioritized by high-risk behaviors, pollutants of concern, and target audiences.
- Expand outreach to homeowners' association (HOA) common lands and HOA incentives.
- Develop an outreach and training program for property managers responsible for HOAs and maintenance districts.
- Enhance and expand trash cleanups through community-based organizations involving target audiences.
- Improve consistency and content of websites to highlight enforceable conditions and reporting methods.
- Develop a targeted education and outreach program for homeowners with orchards or other agricultural land uses on their property.
- Enhance school and recreation-based education and outreach.
- Develop education and outreach to reduce over-irrigation.
- Enhance education and outreach based on results of effectiveness survey and changing regulatory requirements.

4.1.13 Public Education and Participation: Initiatives to Reduce Pollutants Directly (Ref 13)

These strategies differ from the previous group, it that they aim to reduce pollutants directly by targeting business and industries. This list includes:

- Provide technical education and outreach to the development community on the design and implementation requirements of the MS4 Permit and Water Quality Improvement Plan requirements.
- Develop regional training for water-using mobile businesses.
- Promote and encourage implementation of designated BMPs in commercial and industrial areas.
- Outreach to impacted industry regarding minimum BMP requirement updates. Affects commercial, industrial, residential development.

While the total effect of the strategies cannot be determined at this time, it is assumed that the targeting of pollutants will improve the environment and benefit habitats and aesthetics.

The strategies which target commercial areas are assumed to effect more benefit categories, consistent benefit category scoring for other strategies which require minimum BMPs.

4.1.14 Enforcement Response Plan: Initiatives to Change Behavior (Ref 14)

The Enforcement Response Plan strategies can be categorized by 3 separate desired outcomes, and have been grouped separately. These strategies are focused at changing behavior.

It can be assumed that irrigation cost savings will occur as one strategy specifically targets over-irrigation. Where irrigation cost savings occur, there can potentially be emission savings. This is due to the reduced energy needed to provide the water, which in turn reduces the emissions generated from energy production. More information would be needed about these projects to determine the extent to which irrigation cost savings are realized.

List of Enforcement Response Plan Strategies to Change Behavior:

- Continue to implement escalating enforcement responses to compel compliance with statutes, ordinances, permits, contracts, orders, and other requirements for IDDE, development planning, construction management, and existing development in the Enforcement Response Plan.
- Increase enforcement of over-irrigation.

4.1.15 Enforcement Response Plan: Initiatives to Reduce Pollutants Directly (Ref 15)

This strategy differs from the previous, in that its outcome creates initiatives to reduce pollutants directly.

List of Enforcement Response Plan Strategies to Reduce Pollutants Directly:

- Increase enforcement associated with property-based inspections.
- Increase enforcement of sweeping and maintenance of private roads and parking lots in targeted areas.
- Increase identification and enforcement of actionable erosion and slope stabilization issues on private property and require stabilization and repair.
- Increase enforcement of water-using mobile businesses.

4.1.16 Enforcement Response Plan - Improve Structural Systems Performance (Ref 16)

This strategy in the Enforcement Response Plan is assumed to improve structural systems performance through minimum BMP enforcement, which is different from the targeted outcome of the other strategies:

- Increase enforcement of minimum BMPs for existing residential, commercial, and industrial development, including power washing.

As this strategy targets commercial and industrial areas, consistent benefit category scoring for other strategies which require minimum BMPs is used.

4.1.17 Additional Nonstructural Strategies- Reduce Pollutants Directly (Ref 17)

The remaining Nonstructural strategies related to pollutant reduction are grouped together, and separated from the additional strategies which improve structural systems performance. They are assumed to see habitat related benefits, but due to the broad nature and lack of specific details, that is the only benefit category affected. Additional outreach is assumed to provide Public Education benefits.

List of Additional Nonstructural Strategies which Reduce Pollutants Directly:

- Address and clean up pollutants from homeless encampments through Homeless Outreach Team
- Continue participating in source reduction initiatives
- Coordinate with other City of San Diego Departments to replace City-owned vehicle brake pads with copper-free brake pads as they become commercially available
- Pesticide Use Reduction
- Zinc Reduction Program
- San Dieguito Source Identification and Prioritization Process

4.1.18 Additional Nonstructural Strategies - Improve Structural Systems Performance (Ref 18)

These strategies differ from those which seek to reduce pollutants directly, as these target outcomes to improve structural systems and have specific tasks such as ‘actively monitor erosion’ are expected to positively impact habitat and flooding benefits. All the strategies which are research studies are assumed to provide public education benefits.

List of Additional Nonstructural Strategies which Improve Structural Systems Performance:

- Proactively monitor for erosion, and complete minor repair and slope stabilization on municipal property
- Using adaptive management, delist the beach segment from the TMDL and Attachment E of the MS4 Permit
- Los Peñasquitos Watershed Special Study
- Reference watershed study
- Reference beach study

- Tecolote Creek Quantitative Microbial Risk Assessment (QMRA)
- Implement ASBS Compliance Plan
- Collaborate with City of San Diego PUD and other watershed stakeholders in the Lake Hodges Water Quality Concentration Study. Study will characterize conditions and identify sources.
- Develop and implement targeted roof replacement incentive program for Chollas

4.1.19 Green Infrastructure (Ref 19)

These strategies produce a large amount of quantifiable benefits due to the research that exists demonstrating the effectiveness of green infrastructure. This means that in most cases, at a minimum, the benefits can be measured. In certain cases, they can be monetized when enough information is available. As the specific strategies vary by watershed, a high level summary is provided.

Several BMPs involve increasing the total area (acres) of bioretention and permeable pavement on public parcels. Other strategies focus on specific target sites such as parks on green lots.

Strategies with specific design features (such as size of bioretention, etc.) allow for the ability to calculate the amount of storm water runoff retained, which can be used in to quantify Flood Risk Reduction, where applicable.

Less information is known about how these systems will fully operate, so it is possible that there could be irrigation cost savings, but such benefits cannot be accurately quantified without additional information. Where instances of irrigation cost savings could occur, some level of emission savings could also occur because of reduced energy use for delivering water.

Changes in biomass at a site (due to green streets plantings, or bioretention) can have quantifiable impacts on air quality and climate. The quantified amount depends on the specific properties of the new vegetation. Assuming that changes in biomass can be quantified, it is possible to suggest that noise reduction is a potential benefit, and local aesthetics would be improved. Local aesthetics would be quantified by the area of improved land.

An increase in biomass could reduce ambient temperatures, but the scale would be localized and small overall. Thus, we scored this other benefit category as ‘potential.’’

In instances where aesthetics are realized, business development can be quantified if enough information is available about the local characteristics of a green Infrastructure site (i.e., the proximity of the site to existing retail businesses).

Projects which provide pedestrian or bike access such as a green street or open space are assumed to provide quantifiable recreational benefits, such as additional miles of

walkable or livable streets. The amount of these benefits will depend on data on size of the local population, the area of the site, and site usage.

4.1.20 Green Infrastructure: Green Streets (Ref 20)

Due to the information available regarding bioretention and the size of implementation, it can be assumed green streets will have the same scoring as the green infrastructure projects. As the specific strategies vary by watershed, a high level summary is provided. Several BMPs involve increasing the total area (acres) of green streets on specific avenues or subwatersheds.

4.1.21 Multiuse Treatment Areas: Infiltration and Detention Basins (Ref 21)

This section describes the process for scoring the structural strategies consisting of infiltration and detention basins.

It is assumed that the strategies for both golf courses involve similar wetland system projects, which are assumed to increase total biomass and provide entrainment and sequestration. If the total biomass change can be quantified, air and climate benefits can be measured and monetized.

While underground systems will be able to provide flood risk reduction, which in turn protects local habitats and ecological systems, any benefit categories that depend on changes in the above ground environment (such as habitat benefits) will not be affected, and are indicated as 'Not Applicable.' Projects that occur on public land, such as schools, provide the opportunity for educating the public or students about the strategy, and can be quantified by the number of people who learn about the strategy. These benefits depend on the number of students enrolled at the school, or the population of a neighboring community where public outreach about the project occurs.

Where instances of irrigation cost savings are thought to occur, emission savings could occur, but more information would be needed about these projects to determine the extent to which irrigation cost savings are realized.

As the specific strategies vary by watershed, a high level summary is provided. Several BMPs involve the installation of a subsurface detention galley on public parcels. Other options include dry detention systems, sediment basins, infiltration basins, and hyrdomodification BMPs.

4.1.22 Multiuse Treatment Areas: Stream, Channel and Habitat Rehabilitation Projects (Ref 22)

As these strategies target streams and other ecological areas, it is assumed habitats and aesthetics will improve, and can be measured using the area of the project. This strategy is assumed to be similar to the MS4 and Retrofit and Rehabilitation in Areas of Existing Development strategies.

As the specific strategies vary by watershed, a high level summary is provided. Several BMPs involve either wetlands or the Chollas Creek.

4.1.23 Water Quality Improvement BMPs: Proprietary BMPs (Ref 23)

Due to the nature of these projects, a basic assumption is the projects will improve water flow, and flood control and habitat benefits can occur. However, no other benefit categories can reasonably be expected to be impacted until more specific details about the sites and projects are known.

As the specific strategies vary by watershed, a high level summary is provided. Several BMPs involve drainage inserts on public parcels. Others involve hydrodynamic separation systems, dry-weather, or low flow diversions. Some are broader in nature, and provide direction on implementing a certain amount of acres of multiuse treatment area projects on private parcels and/or through public-private partnerships with various total storage sizes.

4.2 Optional Jurisdictional Strategies

This section provides a discussion of the methodology for assigning scoring categories to the Optional Jurisdictional Strategies, as well as sub-categories. Optional strategies are those strategies that may be triggered in the future to achieve the interim and final numeric goals." Many of these strategies are assumed to have a similar outcome and thus a similar other benefit category scoring as their Jurisdictional counterpart. The scores take into account the *potential* benefits that may occur, given the information available, and assumptions that are listed in each strategy. The scoring for these strategies is presented in Section 5, in Table 3 and Table 7. These strategies represent the latest consideration in an evolving process of identification, specification and assessment. Not all strategies have been implemented or have plans for immediate implementation. At the same time, the specification of the design standards also varies from strategy to strategy.

This list of individual strategies has been grouped according to the same categories that are contained in the Water Quality Improvement Plan and are presented in the same chronological order. The information found in the parenthesis next to the strategy group name (*Ref X*), refers to the number in the far left columns of Table 3 and Table 7.

4.2.1 Additional Nonstructural Strategies (Ref 24)

Many of these strategies are studies, which until they are completed, and the recommendations are implemented, cannot produce any benefits other than public education at the moment. Additionally, initiatives that involve participating or collaborating with other agencies or organizations are not applicable to other benefit categories at this time. The removal of invasive plants should protect existing habitats.

Additonal Nonstructural Strategies include:

Project	Location
Conduct Sustainable Return on Investment (SROI) analysis to estimate strategies' co-benefits and impacts to the public and the private sector on a common scale.	City-wide
Collaborate with the County, if a County-led regional social services effort is established, to provide sanitation and trash management for person experiencing homelessness and determine if the program is suitable and appropriate for jurisdictional needs to meet goals.	City-wide
Identify strategy resources and funding to support mapping and assessment of agricultural operations.	SDG above Lake Hodges
Coordinate with County of San Diego and identify resources and funding to implement a program to target on-site wastewater treatment (septic) systems. May include mapping and risk assessment, inspection, or maintenance practices.	SDG
Participate in an assessment to determine if implementation of an urban tree canopy (UTC) program would benefit water quality and other City goals.	City-wide
Conduct a feasibility study to test Permeable Friction Course (PFC), porous asphalt that overlays impermeable asphalt.	City-wide
As opportunities arise and funding sources are identified, protect areas that are functioning naturally by avoiding impervious development and degradation on unpaved open space areas, creating permanent open space protections on undeveloped city-owned land, and accepting privately-owned undeveloped open areas.	City-wide MB-Rose Canyon
Add permanent open spaces protections to underdeveloped city-owned land in and on the rim of Rose canyon and San Clemente Canyon.	MB, Rose Canyon
Forming a linear "park" from the southern end of Marian Bear Natural Park to the mouth of Rose Creek.	MB, Rose Canyon
Lake Hodges Natural Treatment System Project	SDG: Lake Hodges
If a regional collaboration is established for the Los Peñasquitos Lagoon, participate in restorative efforts in collaboration with TMDL Responsible Parties and TMDL responsible parties and other stakeholders.	Los Peñasquitos Lagoon Subwatershed
Participate in a watershed council or group and support the establishment of a watershed coordinator if one is established.	City-wide
Participate in a watershed council or group and support the establishment of a watershed coordinator if one is established. Includes participation in Rose Creek Watershed Team.	MB, Rose Canyon
Removal of invasive plants.	MB, Rose Canyon

4.2.2 Green Infrastructure – Optional Jurisdictional Strategies (Ref 25)

These strategies follow the same scoring as Jurisdictional Green Infrastructure projects. Under certain circumstances, these Green Infrastructure Strategies could be implemented.

4.2.3 Green Infrastructure: Green Streets – Optional Jurisdictional Strategies (Ref 26)

This strategy follows the same scoring as Jurisdictional Green Streets projects. Green Streets Strategies could be implemented if:

- If interim load reduction goals are not met and additional green infrastructure is required, the additional acreage of bioretention and permeable pavement can be implemented through green streets if potential opportunities for green infrastructure implementation on public parcels are not available.

4.2.4 Multiuse Treatment Areas: Infiltration and Detention Basins – Optional Jurisdictional Strategies (Ref 27)

These strategies follow the same scoring as Jurisdictional Multiuse Treatment Areas: Infiltration and Detention Basins projects.

4.2.5 Multiuse Treatment Areas: Stream, Channel, and Habitat Rehabilitation Projects – Optional Jurisdictional Strategies (Ref 28)

These strategies follow the same scoring as Jurisdictional Multiuse Treatment Areas: Stream, Channel, and Habitat Rehabilitation projects. List of Stream, Channel, and Habitat Rehabilitation Project includes:

- If interim load reduction goals are not met and additional stream, channel, and habitat rehabilitation projects are required, implement as needed.
- Day lighting Cudahy Creek implementation.
- An example of this would be to lengthen the Genesee Avenue Bridge in Rose Canyon in order to eliminate the berm that bisects the riparian corridor. This would restore the natural riparian corridor and promote wildlife and recreational passage under Genesee.

4.2.6 Multiuse Treatment Areas: Other Opportunities – Optional Jurisdictional Strategies (Ref 29)

This strategy follows the same scoring as Jurisdictional Multiuse Treatment Areas: Other Opportunities projects. Other Opportunity Strategy is defined as:

- If interim load reduction goals are not met and additional multiuse treatment area projects are required, implement, as needed, on private parcels and/or through public-private partnerships.

4.2.7 Water Quality Improvement BMPs: Trash Segregation – Optional Jurisdictional Strategies (Ref 30)

These projects specifically target street litter or debris, and are assumed to create an aesthetic improvement, and can be quantified with estimates on the volume of litter removed. Depending on the local land-use for the streets targeted, business development could potentially increase. Jobs can also be supported by the money spent on operation and maintenance activities. Trash Segregation Strategies would be implemented under conditions defined as:

- If interim load reduction goals are not met and additional trash segregation projects are required, implement as needed.
- If interim load reduction goals are not met and additional proprietary projects are required, implement as needed.
- If interim load reduction goals are not met and additional dry weather flow separation and treatment projects are required, implement as needed.

5 Results of Assessment

An overview of all the strategies, with the number of benefits, by benefit level, shown in descending order is presented in Table 2 and Table 3. Additionally, the total point value across the other benefit categories is presented in the far right column, with the header 'Total Point Value.' For example, green infrastructure has the greatest benefit score for both the jurisdictional and optional jurisdictional strategies. It is located at the top of Table 2, with a 'Total Point Value' of 7.3. This is calculated by:

- Multiplying the number of monetizable benefits (2), by their benefit scoring value (1);
- Multiplying the number of measurable benefits (3), by their benefit scoring value (0.667),
- Multiplying the number of potential benefits (10), by their benefit scoring value (0.333),
- Multiplying the number of not applicable benefits (0), by their benefit scoring value (0),
- Adding the subtotals together results in a total score of (2 + 2 + 3.3 + 0 = 7.3).

A detailed summary of the potential level of impact for each strategy and benefit category is presented in Table 6 and Table 7. For convenience, the number in the far left column, with the header 'Ref,' corresponds to the number next to the strategy group descriptions in the previous sections, and is consistent across all tables. Using Green Infrastructure as an example, the number in the first column of Table 2, (19) can be found in Table 6, and corresponds to the discussion of green infrastructure in the previous section, *Green Infrastructure (Ref 19)*

Table 2: Overview of Jurisdictional Strategies in Descending Order

Ref. [1]	Description of Strategy Group	Category	Strategy Outcome	Monetizable	Measurable	Potential	Not Applicable	Total Point Value	Number of Applicable Benefits
19	Green Infrastructure	Structural	Green Infrastructure	2	3	10	0	7.33	15
20	Green Streets	Structural	Green Infrastructure	2	3	10	0	7.33	15
5	Commercial, Industrial, Municipal, and Residential Facilities and Areas[2]	Non-Structural	Initiatives to Change Behavior	0	5	6	4	5.33	11
21	Multiuse Treatment Areas - Infiltration and Detention Basins	Structural	Multiuse Treatment Areas	2	1	6	6	4.67	9
1	All Development Projects	Non-Structural	Initiatives to Reduce Pollutants Directly	0	0	14	1	4.67	14
2	Priority Development Projects (PDPs)	Non-Structural	Increase # Of Structural Systems	0	0	14	1	4.67	14
3	Construction Management	Non-Structural	Improve Structural Systems Performance	0	0	14	1	4.67	14
4	Commercial, Industrial, Municipal, and Residential Facilities and Areas[1]	Non-Structural	Improve Structural Systems Performance	0	0	14	1	4.67	14
9	Retrofit and Rehabilitation in Areas of Existing Development - Structures	Non-Structural	Increase # Of Structural Systems	0	0	14	1	4.67	14

Table 2: Overview of Jurisdictional Strategies in Descending Order (continued)

Ref.[1]	Description of Strategy Group	Category	Strategy Outcome	Monetizable	Measurable	Potential	Not Applicable	Total Point Value	Number of Applicable Benefits
13	Public Education and Participation: Reduce Pollutants Directly	Non-Structural	Initiatives to Reduce Pollutants Directly	0	0	14	1	4.67	14
15	Enforcement Response Plan: Improve Structural Systems Performance	Non-Structural	Improve Structural Systems Performance	0	0	14	1	4.67	14
22	Multiuse Treatment Areas - Stream, Channel and Habitat Rehabilitation Projects	Structural	Multiuse Treatment Areas	0	2	8	5	4.00	10
14	Enforcement Response Plan: Initiatives to Change Behavior	Non-Structural	Initiatives to Change Behavior	0	1	6	8	2.67	7
10	Retrofit and Rehabilitation in Areas of Existing Development	Non-Structural	Improve Structural Systems Performance	0	2	3	10	2.33	5
16	Enforcement Response Plan: Initiatives to Reduce Pollutants Directly	Non-Structural	Initiatives to Reduce Pollutants Directly	0	2	3	10	2.33	4
12	Public Education and Participation: Initiatives to Change Behavior	Non-Structural	Initiatives to Change Behavior	0	1	4	10	2.00	4
11	Illicit Discharge, Detection, and Elimination (IDDE) Program	Non-Structural	Initiatives to Change Behavior	0	1	3	11	1.67	4
7	Roads, Street, and Parking Lots - Cleaning Maintaining, etc	Non-Structural	Improve Structural Systems Performance	0	1	2	12	1.33	3

Table 2: Overview of Jurisdictional Strategies in Descending Order (continued)

Ref.[1]	Description of Strategy Group	Category	Strategy Outcome	Monetizable	Measurable	Potential	Not Applicable	Total Point Value	Number of Applicable Benefits
8	Pesticide, Herbicides, and Fertilizer BMP Program	Non-Structural	Initiatives to Reduce Pollutants Directly	0	1	2	12	1.33	3
6	MS4 Infrastructure	Non-Structural	Improve Structural Systems Performance	0	0	3	12	1.00	3
18	Additional Nonstructural Strategies: Improve Structural Systems Performance	Non-Structural	Improve Structural Systems Performance	0	0	3	12	1.00	3
17	Additional Nonstructural Strategies: Initiatives to Reduce Pollutants Directly	Non-Structural	Initiatives to Reduce Pollutants Directly	0	0	2	13	0.67	2
23	Water Quality Improvement BMPs - Proprietary BMPs	Structural	Water Quality Improvement	0	0	2	13	0.67	2

1. The reference number refers to strategy groups presented in pages 9-28.

Table 3: Overview of Optional Jurisdictional Strategies by Descending Order

Ref.[1]	Description of Strategy Group	Category	Strategy Outcome	Monetizable	Measurable	Potential	Not Applicable	Total Point Value	Number of Applicable
25	Green Infrastructure – Optional Strategies	Structural	Green Infrastructure	2	3	10	0	7.33	15
26	Green Streets – Optional Strategies	Structural	Green Infrastructure	2	3	10	0	7.33	15
27	Multiuse Treatment Areas-Infiltration and Detention Basins – Optional Strategies	Structural	Multiuse Treatment Areas	2	1	6	6	4.67	9
28	Multiuse Treatment Areas-Stream, Channel and Habitat Rehabilitation Projects – Optional Jurisdictional Strategies	Structural	Multiuse Treatment Areas	0	2	8	5	4.00	9
29	Multiuse Treatment Areas- Other Opportunities – Optional Strategies	Structural	Multiuse Treatment Areas	0	1	8	6	3.33	9
30	Water Quality Improvement BMPs-Trash Segregation – Optional Strategies	Structural	Water Quality Improvement	0	0	3	12	1.00	2
24	Additional Nonstructural Strategies – Optional Jurisdictional Strategies	Non-Structural	Initiatives to Reduce Pollutants Directly	0	0	2	13	0.67	2

1. The reference number refers to strategy groups presented in pages 9-29.

In Table 6 and Table 7, a detailed summary of the potential level of impact for each strategy and benefit category is presented. For these tables, a key to symbols and point value is presented for each level of impact in Table 4. In some cases, the strategy group includes individual strategies that are classified by different types of strategy outcomes. Table 5 shows the numerical key used in Table 6 and Table 7. To make the evaluation process more transparent, a discussion about the assumptions and rationale for the assignment of a benefit category level to a specific strategy is briefly discussed for each type of Water Quality Improvement Plan strategy following the summary tables. The reference for the discussion below for each strategy is listed in column 1 of Table 6 and Table 7. In addition to presenting point values, the total number of potentially applicable benefits is also shown.

Table 4: Key to Symbols

Symbol	Level of Impact	Point Value
●	Monetizable	1
◉	Measurable	0.67
○	Potential	0.33
⊗	Not Applicable	0

Table 5 provides a key to the number in the column with the header 'Strategy Outcome.' For example, the first strategy group listed, All Development Projects, has the number 6 in the 'Strategy Outcome' column. The number 6 in Table 5 indicates that All Development Projects are Nonstructural Strategies comprised of Initiatives to Reduce Pollutants Directly.

Table 5: Key to Strategy Outcome

ID	Category of Strategy	Type of Strategy Outcome
1	Structural	Green Infrastructure
2	Structural	Multi Use Treatment
3	Structural	Water Quality Improvement
4	Nonstructural	Improve Structural Systems Performance
5	Nonstructural	Increase the Number of Structural Systems
6	Nonstructural	Initiatives to Reduce Pollutants Directly
7	Nonstructural	Initiatives to Change Behavior

Table 6: Overview of Potential Other Benefits of Water Quality Improvement Plan Jurisdictional Strategies

			Financial		Environmental						Social								
Ref[1]	Strategy Group	Strategy Outcome[2]	Water Cost Savings	Energy Cost Savings	Flood Risk Reduction	Air Particulate Entrainment	Climate Impacts	Habitat Related Benefits	Air Quality Emission Reduction	GHG Emission Reduction	Property Value Enhancement	Recreational Benefits	Business Development & Jobs	Crime Reduction	Public Education/ Environmental Stewardship	Noise Reduction	Heat Island Effect	Total Point Value	Number of Applicable Benefits
1	All Development Projects	4	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	4.7	14
2	Priority Development Projects (PDPs)	5	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	4.7	14
3	Construction Management	4	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	4.7	14
4	Commercial, Industrial, Municipal, and Residential Facilities and Areas	4	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	4.7	14

Table 6: Overview of Potential Other Benefits of Water Quality Improvement Plan Jurisdictional Strategies (continued)

			Financial		Environmental						Social								
Ref[1]	Strategy Group	Strategy Outcome[2]	Water Cost Savings	Energy Cost Savings	Flood Risk Reduction	Air Particulate Entrainment	Climate Impacts	Habitat Related Benefits	Air Quality Emission Reduction	GHG Emission Reduction	Property Value Enhancement	Recreational Benefits	Business Development & Jobs	Crime Reduction	Public Education/ Environmental Stewardship	Noise Reduction	Heat Island Effect	Total Point Value	Number of Applicable Benefits
5	Commercial, Industrial, Municipal, and Residential Facilities and Areas	7	⊙ [0.67]	⊙ [0.67]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	⊙ [0.67]	⊙ [0.67]	○ [0.33]	⊗ [0]	○ [0.33]	⊗ [0]	⊙ [0.67]	⊗ [0]	○ [0.33]	5.3	11
6	MS4 Infrastructure	4	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	1.0	3
7	Roads, Street, and Parking Lots	4	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	⊙ [0.67]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	1.3	3
8	Pesticide, Herbicides, and Fertilizer BMP Program	6	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊙ [0.67]	⊗ [0]	⊗ [0]	1.3	3

Table 6: Overview of Potential Other Benefits of Water Quality Improvement Plan Jurisdictional Strategies (continued)

			Financial		Environmental						Social								
Ref[1]	Strategy Group	Strategy Outcome[2]	Water Cost Savings	Energy Cost Savings	Flood Risk Reduction	Air Particulate Entrainment	Climate Impacts	Habitat Related Benefits	Air Quality Emission Reduction	GHG Emission Reduction	Property Value Enhancement	Recreational Benefits	Business Development & Jobs	Crime Reduction	Public Education/ Environmental Stewardship	Noise Reduction	Heat Island Effect	Total Point Value	Number of Applicable Benefits
9	Retrofit and Rehabilitation in Areas of Existing Development - Improve Structural Systems Performance	5	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	4.7	14
10	Retrofit and Rehabilitation in Areas of Existing Development - Increase the Number of Structural Systems	4	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	◉ [0.67]	⊗ [0]	⊗ [0]	◉ [0.67]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	2.3	5

Table 6: Overview of Potential Other Benefits of Water Quality Improvement Plan Jurisdictional Strategies (continued)

			Financial		Environmental						Social								
Ref[1]	Strategy Group	Strategy Outcome[2]	Water Cost Savings	Energy Cost Savings	Flood Risk Reduction	Air Particulate Entrainment	Climate Impacts	Habitat Related Benefits	Air Quality Emission Reduction	GHG Emission Reduction	Property Value Enhancement	Recreational Benefits	Business Development & Jobs	Crime Reduction	Public Education/ Environmental Stewardship	Noise Reduction	Heat Island Effect	Total Point Value	Number of Applicable Benefits
11	Illicit Discharge, Detection, and Elimination (IDDE) Program	7	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	○ [0.33]	⊗ [0]	◉ [0.67]	⊗ [0]	⊗ [0]	1.7	4
12	Public Education and Participation: Initiatives to Change Behavior	7	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	○ [0.33]	⊗ [0]	◉ [0.67]	⊗ [0]	⊗ [0]	2.0	4

Table 6: Overview of Potential Other Benefits of Water Quality Improvement Plan Jurisdictional Strategies (continued)

			Financial		Environmental						Social								
Ref[1]	Strategy Group	Strategy Outcome[2]	Water Cost Savings	Energy Cost Savings	Flood Risk Reduction	Air Particulate Entrainment	Climate Impacts	Habitat Related Benefits	Air Quality Emission Reduction	GHG Emission Reduction	Property Value Enhancement	Recreational Benefits	Business Development & Jobs	Crime Reduction	Public Education/ Environmental Stewardship	Noise Reduction	Heat Island Effect	Total Point Value	Number of Applicable Benefits
13	Public Education and Participation: Initiatives to Reduce Pollutants Directly	6	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	4.7	14
14	Enforcement Response Plan: Initiatives to Change Behavior	7	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	○ [0.33]	⊗ [0]	◉ [0.67]	⊗ [0]	⊗ [0]	2.7	9
15	Enforcement Response Plan: Improve Structural Systems Performance	4	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	4.7	14

Table 6: Overview of Potential Other Benefits of Water Quality Improvement Plan Jurisdictional Strategies (continued)

			Financial		Environmental						Social								
Ref[1]	Strategy Group	Strategy Outcome[2]	Water Cost Savings	Energy Cost Savings	Flood Risk Reduction	Air Particulate Entrainment	Climate Impacts	Habitat Related Benefits	Air Quality Emission Reduction	GHG Emission Reduction	Property Value Enhancement	Recreational Benefits	Business Development & Jobs	Crime Reduction	Public Education/ Environmental Stewardship	Noise Reduction	Heat Island Effect	Total Point Value	Number of Applicable Benefits
16	Enforcement Response Plan: Initiatives to Reduce Pollutants Directly	6	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	◉ [0.67]	⊗ [0]	○ [0.33]	⊗ [0]	◉ [0.67]	⊗ [0]	⊗ [0]	2.3	4
17	Additional Nonstructural Strategies: Initiatives to Reduce Pollutants Directly	6	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	0.7	2

Table 6: Overview of Potential Other Benefits of Water Quality Improvement Plan Jurisdictional Strategies (continued)

			Financial		Environmental						Social								
Ref[1]	Strategy Group	Strategy Outcome[2]	Water Cost Savings	Energy Cost Savings	Flood Risk Reduction	Air Particulate Entrainment	Climate Impacts	Habitat Related Benefits	Air Quality Emission Reduction	GHG Emission Reduction	Property Value Enhancement	Recreational Benefits	Business Development & Jobs	Crime Reduction	Public Education/ Environmental Stewardship	Noise Reduction	Heat Island Effect	Total Point Value	Number of Applicable Benefits
18	Additional Nonstructural Strategies: Improve Structural Systems Performance	4	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	1.0	3
19	Green Infrastructure	1	○ [0.33]	○ [0.33]	◉ [0.67]	● [1]	● [1]	○ [0.33]	○ [0.33]	○ [0.33]	◉ [0.67]	○ [0.33]	◉ [0.67]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	7.3	15
20	Green Streets	1	○ [0.33]	○ [0.33]	◉ [0.67]	● [1]	● [1]	○ [0.33]	○ [0.33]	○ [0.33]	◉ [0.67]	○ [0.33]	◉ [0.67]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	7.3	15

Table 6: Overview of Potential Other Benefits of Water Quality Improvement Plan Jurisdictional Strategies (continued)

			Financial		Environmental						Social								
Ref[1]	Strategy Group	Strategy Outcome[2]	Water Cost Savings	Energy Cost Savings	Flood Risk Reduction	Air Particulate Entrainment	Climate Impacts	Habitat Related Benefits	Air Quality Emission Reduction	GHG Emission Reduction	Property Value Enhancement	Recreational Benefits	Business Development & Jobs	Crime Reduction	Public Education/ Environmental Stewardship	Noise Reduction	Heat Island Effect	Total Point Value	Number of Applicable Benefits
21	Multiuse Treatment Areas - Infiltration and Detention Basins	2	○ [0.33]	○ [0.33]	○ [0.33]	● [1]	● [1]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	◉ [0.67]	⊗ [0]	⊗ [0]	4.7	9
22	Multiuse Treatment Areas - Stream, Channel and Habitat Rehabilitation Projects	2	○ [0.33]	○ [0.33]	◉ [0.67]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	◉ [0.67]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	4.0	10
23	Water Quality Improvement BMPs	3	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	0.7	2

1. The reference number refers to strategy groups presented in pages 9-29.
2. Strategy Outcome as described in Table 5.

Table 6: Overview of Potential Other Benefits of Water Quality Improvement Plan Jurisdictional Strategies (continued)

Table 7: Overview of Potential Other Benefits of Water Quality Improvement Plan - Optional Jurisdictional Strategies

			Financial		Environmental						Social								
Ref[1]	**Strategy Group**	**Strategy Outcome[2]**	**Water Cost Savings**	**Energy Cost Savings**	**Flood Risk Reduction**	**Air Particulate Entrainment**	**Climate Impacts**	**Habitat Related Benefits**	**Air Quality Emission Reduction**	**GHG Emission Reduction**	**Property Value Enhancement**	**Recreational Benefits**	**Business Development & Jobs**	**Crime Reduction**	**Public Education/ Environmental Stewardship**	**Noise Reduction**	**Heat Island Effect**	**Total Point Value**	**Number of Applicable Benefits**
24	**Additional Nonstructural Strategies**	6	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	**0.7**	**2**
25	**Green Infrastructure**	1	○ [0.33]	○ [0.33]	◉ [0.67]	● [1]	● [1]	○ [0.33]	○ [0.33]	○ [0.33]	◉ [0.67]	○ [0.33]	◉ [0.67]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	**7.3**	**15**
26	**Green Streets**	1	○ [0.33]	○ [0.33]	◉ [0.67]	● [1]	● [1]	○ [0.33]	○ [0.33]	○ [0.33]	◉ [0.67]	○ [0.33]	◉ [0.67]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	**7.3**	**15**

Table 7: Overview of Potential Other Benefits of Water Quality Improvement Plan - Optional Jurisdictional Strategies (continued)

			Financial		Environmental						Social								
Ref[1]	Strategy Group	Strategy Outcome[2]	Water Cost Savings	Energy Cost Savings	Flood Risk Reduction	Air Particulate Entrainment	Climate Impacts	Habitat Related Benefits	Air Quality Emission Reduction	GHG Emission Reduction	Property Value Enhancement	Recreational Benefits	Business Development & Jobs	Crime Reduction	Public Education/ Environmental Stewardship	Noise Reduction	Heat Island Effect	Total Point Value	Number of Applicable Benefits
27	Multiuse Treatment Areas - Infiltration and Detention Basins	2	○ [0.33]	○ [0.33]	○ [0.33]	● [1]	● [1]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	◉ [0.67]	⊗ [0]	⊗ [0]	4.7	9
28	Multiuse Treatment Areas - Stream, Channel and Habitat Rehabilitation Projects	2	○ [0.33]	○ [0.33]	◉ [0.67]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	◉ [0.67]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	4.0	9
29	Multiuse Treatment Areas - Other Opportunities	2	○ [0.33]	○ [0.33]	◉ [0.67]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	3.3	9

Table 7: Overview of Potential Other Benefits of Water Quality Improvement Plan - Optional Jurisdictional Strategies (continued)

			Financial		Environmental						Social								
Ref[1]	**Strategy Group**	**Strategy Outcome[2]**	**Water Cost Savings**	**Energy Cost Savings**	**Flood Risk Reduction**	**Air Particulate Entrainment**	**Climate Impacts**	**Habitat Related Benefits**	**Air Quality Emission Reduction**	**GHG Emission Reduction**	**Property Value Enhancement**	**Recreational Benefits**	**Business Development & Jobs**	**Crime Reduction**	**Public Education/ Environmental Stewardship**	**Noise Reduction**	**Heat Island Effect**	**Total Point Value**	**Number of Applicable Benefits**
30	**Water Quality Improvement BMPs - Trash Segregation**	3	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	○ [0.33]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	⊗ [0]	**1.0**	**2**

1. The reference number refers to strategy groups presented in pages 9-29.
2. Strategy Outcome as described in Table 5.

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Appendix 1: Sustainable Return on Investment Assessment of Water Quality Improvement Strategies. Draft Report. June 2014

Note to reader: This appendix is a re-print of the Phase 1 Draft Report from this project. Some aspects of the strategies and framework differ from what is included in the main report. The literature review in the following Phase 1 report provides a foundation for all subsequent analysis.

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SUSTAINABLE RETURN ON INVESTMENT ASSESSMENT OF WATER QUALITY IMPROVEMENT STRATEGIES

Draft Report

June 2014

Prepared for:

City of San Diego, Storm Water Division

Prepared by:

HDR Engineering, Inc.
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Long Beach, CA 90802

Executive Summary

The aim of this project is to help the City of San Diego Storm Water Division account for the costs and benefits of storm water management strategies. Benefits (sometimes called "co-benefits") include a variety of outcomes beyond improved water quality that some storm water strategies may achieve. The Division has identified a range of structural best management practices (BMPs (e.g., a constructed runoff reduction system such as a bio-swale), and nonstructural BMP activities (i.e. programs that promote installations of constructed systems, or reduce pollutants directly through education and outreach, for example). The Division now seeks to incorporate information on benefits of strategies into a prioritization approach so that as the Division selects strategies to meet its regulatory requirements, it is generating the best value for the community and local businesses.

This report summarizes the findings of a literature review on storm water management benefits and costs and a programmatic assessment of the Division's strategies and associated benefits. The purpose of the assessment is to determine which types of benefits, beyond water quality improvements, might arise from the Division's different storm water management strategies and to determine if and how these benefits can be quantified, and included in a decision making framework.

Our findings in this report indicate that many types of benefits can accrue to local residents, businesses, and the general public. Common types of benefits that have been evaluated in a number of cities around the U.S. include flood risk reduction, reduced energy consumption (and associated air quality emissions), and improved aesthetics. Computing benefits of BMPs has been standardized to some extent in the Center for Neighborhood Technology (CNT) report which outlines the data and calculations for a number of benefits (CNT, 2010). For the Division, a similar calculation process could be implemented and it would be consistent with efforts implemented in other cities. However, a significant level of uncertainty would arise in preparing such estimates without specific data on BMP designs and activities for each strategy as well as site specific information about where they would be implemented.

The City developed several dozen storm water management strategies ranging from types of structural BMPs to projects designed to affect public or municipal employee polluting behavior. Some of the strategies listed are assessment projects that provide information necessary to make decisions or to implement a subsequent non-structural strategy. To initiate this study, we grouped the strategies into specific categories:

- Structural
    - Green Infrastructure
    - Multiuse Treatment Areas
    - Water Quality Improvements

- Non Structural
    - Results in increases in the number of structural systems
    - Results in improved performance of existing structural systems
    - Results in changes in behavior that reduced pollutant loads
    - Results in direct removal of pollutants from watersheds

The next best evaluation strategy for the Division at present would entail a simplified assessment of the likely *existence* of quantifiable net benefits for each strategy. In this report, we have evaluated the degree to which benefits can be quantified (and potentially monetized) for each type of strategy. A net result of benefits exceeding negative attributes has been qualitatively assessed based on findings in the literature. This is not to say that the benefit would be greater than implementation costs, but that co-benefits would likely exceed negative impacts to the community of implementing the strategy.

The results of this assessment are shown in Table 1. A “Yes” in one of the table cells indicates that there would be sufficient evidence to quantifiably determine the value of a strategy, provided that information about the strategy and implementation location is better understood. In this high-level summary, it may be assumed that if a quantifiable benefit exists, they would be large enough to generate observable public value and influence decisions accordingly.

These initial findings however must be developed in more detail to provide practical use in prioritizing strategies for the Division. In particular, the feasibility of estimating benefits must assessed for each individually identified strategy (see Appendix 2), not its strategy group as shown in Table 1. With this information, the Division can establish an initial indication of specific strategies that provide the best value. This effort is planned for phase two of this project.

Table 1: Summary of Evidence for Estimating Benefits for Structural and Nonstructural Strategies

Strategy	Structural			Nonstructural			
	Green Infrastructure	Multiuse Treatment Areas	Water Quality Improvement	Increase # Of Structural Systems	Improve Structural Systems Performance	Initiatives To Change Behavior	Initiatives To Reduce Pollutants Directly
Flood Control	YES	YES	YES	YES	YES	YES	
Irrigation Cost Savings	YES			YES	YES	YES	
Energy Cost Savings	YES			YES		YES	YES
Air Particulate Entrainment	YES			YES		YES	YES
Climate Impacts	YES			YES		YES	YES
Habitat Related Benefits							
Air Quality Emission Reduction	YES			YES		YES	YES
GHG Emission Reduction	YES			YES		YES	YES
Heat Island Effect	YES	YES		YES	YES	YES	
Aesthetics	YES	YES		YES	YES	YES	YES
Recreational Benefits	YES	YES		YES	YES	YES	YES
Noise Reduction							
Business Development & Jobs	YES			YES	YES	YES	YES

Crime Reduction		
Public Education/ Environmental Stewardship		

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Acronyms

BCA – Benefit Cost Analysis
BES – Bureau of Environmental Services
BMP – Best Management Practice
Btu – British Thermal Unit

CAMX - California-Mexico Power Area
CEA – Cost-Effectiveness Analysis
CLRP – Comprehensive Load Reduction Plans
CNT – Center for Neighborhood Technology
CO2 – Carbon Dioxide
CSO – Combined Sewer Overflow

DOT – Department of Transportation

EIA – Economic Impact Analysis
EPA –Environmental Protection Agency

IDDE – Illicit Discharge, Detection, and Elimination

kWh – Kilowatt Hour

LACDPW – Los Angeles County Department of Public Works
LID – Low Impact Development

MMSD – Milwaukee Metropolitan Sewage District
MODA – Multi-Objective Decision Analysis
M Wh – Mega Watt Hour

NRDC – Natural Resources Defense Council
NOx - Nitric oxide and nitrogen dioxide
NPV – Net Present Value

O3 – Oxide

PFC – Permeable Friction Course
PM – Particulate Matter
PWD – Philadelphia Water District

SO2 – Sulfur Dioxide
SPU – Seattle Public Utilities
SROI – Sustainable Return on Investment

TBL – Triple Bottom Line
TIGER – Transportation Investment Generating Economic Recovery
TMDL – Total Maximum Daily Load

UTC – Urban Tree Canopy

WAMP – Watershed Asset Management Plan
WERF – Water Environment Research Foundation
WQIP – Water Quality Improvement Plan

1 Introduction

The City of San Diego Storm Water Division (Division) seeks a framework for prioritizing storm water management strategies that have been identified as part of the Water Quality Improvement Plans for each watershed. These strategies include a range of best management practices (BMPs) in structural systems (i.e., a constructed runoff reduction system, such as a bio-swale), and nonstructural activities (i.e. programs that promote installations of constructed systems, or reduce pollutants directly through education and outreach, for example). Each of the identified strategies is intended to contribute to meeting Total Maximum Daily Load (TMDL) regulatory requirements.

At the same time, each strategy can also provide *additional* benefits (sometimes called "Co-benefits") to the community. Depending on the type of strategy, such benefits can include flood risk reduction, reduced energy consumption and associated air quality emissions, improved aesthetics and habitat creation. Of course, not all BMPs generate positive benefits – property damage can occur if infiltration systems are poorly performing or additional street sweeping miles would increase air pollution costs. [3] Whatever the case, accounting for such benefits is challenging because each one is measured in different units and data is rarely available to quantify existing conditions and predicting changed conditions. Even so, estimating benefits can contribute to decision making. WERF (2014) notes that while a number of studies have shown storm water BMPs to be cost-effective and efficient at achieving water quality goals, traditional engineering costing methods fail to adequately value the multiple benefits and improved life-cycle costs that storm water BMPs provide.

The Division has contracted HDR to apply its *Sustainable Return on Investment (SROI)* process to develop a sound prioritization framework that accounts for storm water management benefits. SROI is an economics-based approach to evaluating and communicating the economic benefits and expenditure-based impacts across a *triple bottom line* – the financial, environmental and societal outcomes of a project. The process includes: (a) transparent review of evidence; (b) economic framework for evaluation; (c) workshop-based discussion of evidence; and (d) accounting for risk and uncertainty in key drivers of outcomes. SROI is a proven process, having been implemented in billions of dollars in capital projects over the last 8 years. In this project, we apply SROI to evaluate key economic benefits and use this to develop a sound framework for prioritizing strategies.

This document discusses our initial tasks in this effort. We report on findings from a literature review for substantiating the existence of such benefits, and an evaluation of strategies, to assess how different benefit categories may apply. We also discuss an initial assessment of the applicability of different types of benefits for individual BMP strategies. In addition, we report on an introductory workshop with stakeholders on the concept of storm water management benefits and frameworks to include estimated benefits in

[3] To make the discussion more concise, "Benefits" refer to both positive and negative outcomes.

decision making. In addition, this phase will also determine the methods to account for co-benefits in qualitative, quantitative or monetized metrics.

2 Literature Review on Storm water Management Benefits

Conceptual frameworks and empirical evidence on economic benefits of storm water management have been developed in a number of studies. This chapter characterizes this evidence to establish a foundation for understanding the types of benefits from storm water management that are included in project evaluations in a SROI process. The findings of this literature also indicate that the estimation of benefits beyond water quality improvements is an emerging field. The potential for life cycle cost savings of green infrastructure in suitable locations has been fairly well established. Yet, it has been more difficult to establish standards for estimating the benefits from other aspects of BMPs that affect environmental and societal outcomes. Significant uncertainties remain over the degree to which a BMP can generate tangible benefits. In most cases, benefits depend largely on the design and site conditions.

2.1 What are Economic Benefits and Impacts?

Economic benefits are the fundamental measure of a project's overall worth to society.[4] Storm water management benefits,[5] whether they relate to avoided flood damage, improved air quality, or energy cost savings are evaluated in the same theoretical framework. Economic researchers assess the value for products and services from data on people's expenditures and their preferences for goods that are not sold (e.g. air quality).[6] Research can provide a basis for understanding how people value storm water benefits in terms of financial, environmental and societal benefits. Moreover, this evidence can support agency staff in developing strategies to manage environmental investments to maximize environmental benefits per dollar spent (WERF, 2014, Ecosystem Valuation, 2007).

A complementary measure of the worthiness of a project reflects the expenditures to build and maintain it. These expenditures and their connection to the broader economy are

[4] Benefits are a somewhat esoteric theoretical economic construct of how people value a product or service. The benefit of a product or service is derived from the premise that some people gain greater *value* from the use of a product or service, especially its initial use, than the price they paid for it. For example, the first glass of water to a thirsty person would be much more highly valued and than the last one consumed, even if the price is the same for each glass. It is further assumed that they would be *willing to pay* some amount to gain that value from it, even if it is above the market price. The idea that a person's willingness to pay can be greater than a market price is a fundamental principal of the value gained by consumers.

[5] In standard economic terminology, benefits can be *positive* or *negative* depending on whether they are desirable or undesirable. A negative storm water management benefit can arise if flood control measures that entail infiltration cause damage to neighboring properties.

[6] Goods that are not sold in markets, such as the recreational value from natural areas, can be derived from the expenditures of persons who visit these areas, or the responses of people to responses to structured surveys which to determine a willingness to pay for the hypothetical avoidance of some undesirable impact to such areas.

defined as *economic impacts*. The expenditures on materials, labor, land, and monitoring over the project lifecycle are implementation costs that are measureable and tangible. Economic impacts of storm water management spending are straightforward to estimate since expenditures are readily estimable and the wider economic impacts can be assessed using economic impact multipliers. Results from economic impact analysis, such as the numbers of jobs created from storm water management strategies reflect the impact on the overall economy and can be estimated at the local, regional and even national levels.

2.2 What are the Key Economic Benefits of Storm water Management?

A growing number of researchers have evaluated the economic benefits and impacts of storm water BMPs in addition to cost savings (See: EPA, 2013; WERF, 2014; and CNT, 2010). Some of the most commonly cited benefits stem from the functional ability of BMPs to reduce the risk of flood damage, costs of public infrastructure, and pollution and water treatment costs. EPA (2013) research on case studies of economic benefits of low impact development and green infrastructure revealed that a number of benefits can be characterized along the triple bottom line (Table 2).

Table 2: Examples of Potential Benefits from Green Infrastructure

Environmental benefits	Financial benefits	Societal benefits
Improved water quality	Reduced construction costs relative to grey infrastructure	Improved aesthetics
Improved air quality from trees	Reduced scale of grey infrastructure design	More urban greenways
Improved ground water recharge	–	Increase in public awareness of storm water management
Energy savings from reduced air conditioning	–	Reduced flash flooding
Reduced greenhouse gas emissions	–	Green jobs
Reduced urban heat stress	–	Increase in economic development from improved aesthetics
Reduced sewer overflow		

Source: EPA (2013)

Estimating benefits however can be challenging because of a lack of data on the physical changes and value of such changes. Data gaps can arise for either or both existing site conditions (prior to project implementation) or predicted changes in conditions (after implementation). In all cases, data must be collected at a specific site and project to develop credible benefit estimates. Where data gaps exist, analytical decisions can be made with respect to evaluating some types of benefits in qualitative terms (such as multi-objective decision analyses) or by quantifying uncertainty (using Monte Carlo simulation).

Several categories of benefits have been identified and described in published literature on storm water management benefits. This section reports on results from a literature review that focused on defining benefit categories and describing the conditions when it can arise. More detail on values and calculation methods are discussed in the Appendix 1. To facilitate the understanding of benefits, several groups of benefit categories are defined including: runoff retention/ detention, energy cost savings, air quality improvements, ecosystem services, and community livability. The categories of benefits in each of these groups are described below.

2.2.1 Runoff Retention/Detention Benefits

Several types of green infrastructure (e.g. green roofs, bio-retention, permeable pavement, rain barrels, etc.) are designed to detain, retain and/or infiltrate rain where it falls. Corresponding reductions in storm water runoff lower the total and peak volumes in the storm water system. Benefits of runoff retention / detention include a reduction in downstream flood risk to properties, and reduced irrigation costs for property owners, that is, if the retention systems can supplement irrigation needs. Another potential benefit includes any reduction in erosion in streams and corresponding habitat impacts, but this are rarely evaluated due to data limitations. The effectiveness of green infrastructure in reducing runoff and generating benefits is determined by several factors including local precipitation characteristics, design capacity and maintenance practices over its functional lifespan.

Flood Risk Reduction: Reduced runoff can reduce the frequency and severity of flooding in neighborhoods that are particularly susceptible to it. The effectiveness of green infrastructure on flooding depends on the design capacity and rainfall conditions, scale of implementation across a watershed, soil characteristics (for systems that facilitate infiltration), and watershed characteristics.[7] In addition, if the storm sewers are connected to combined sewer systems, the reduced volume can generate operational cost savings at the wastewater treatment plant.[8] The value of flood control is estimated as a reduction in property damage if flooding occurs.

Irrigation Cost Savings: On-site water retention in rain barrels or other similar systems can supplement irrigation needs in yards and gardens. Available captured water can generate an added benefit of reducing potable demand for irrigation and associated costs for owners. Key drivers of the life cycle cost savings for these systems include local rainfall characteristics (e.g. frequency and depth), storage capacity and water rates. The extent to which these systems can generate irrigation cost savings above installation costs (maintenance costs are often low), depends on the demand for irrigation and ability to meet this demand with stored water. For property owners, supplemental irrigation directly reduces the volumes demanded from public sources and its costs. From a utility and public perspective, reductions in water volumes

[7] Kane County, IL and Lenexa, KS evaluated flood control benefits of future land development scenarios (EPA, 2013). However, because these benefits are site-specific, the results cannot be generalized to other sites.

[8] Wastewater treatment operational cost savings, in the context of combined sewer systems, include reductions in: (a) treatment costs; (b) air pollution emissions; and (c) greenhouse gas emissions (CNT, 2010).

demanded translate into lower levels of energy consumed for water treatment, which in turn reduces air contamination and greenhouse gas emissions (these benefits are discussed in Section 2.2.3).

2.2.2 Energy Cost Savings Benefits

Several aspects of green infrastructure can lower energy use and generate cost savings. For instance, green roofs and trees can change the gain or loss of energy in buildings, and in turn decrease costs for heating or cooling (NRDC, 2013).[9] These benefits are influenced by several site and design factors and accrue directly to property owners.

Energy Cost Savings: Site-specific research has shown that the shade that trees provide adjacent buildings and the additional insulation of green roofs on buildings can lower the heating and cooling energy costs in buildings. Of course, the effectiveness of these BMPs in lowering energy use depends on many factors including the BMP design, type of plant material, building characteristics, and climate conditions (CNT, 2010). In addition, for trees, the benefits would not be realized for several years until they have reached a height and width that provides noticeable shading. In another example, green roofs and other storage systems have been installed at water utilities and have provided a supplemental water source that has reduced energy and operational costs for pumping (EPA, 2013).[10] These costs savings would constitute a benefit directly for the utility, and by extension to its rate-payers.

2.2.3 Emissions Reduction Benefits

Generation of electricity is reduced when green infrastructure (e.g. green roofs or trees) reduces energy demand in buildings, or when water harvesting reduces energy demand at treatment plants. Reductions in electricity demand means that some amount of burning fossil fuels is avoided. As a result, there would be a reduction in the harmful emissions of criteria air contaminants (e.g. NOx, SOx, PM, etc.) and greenhouse gas emissions. The U.S. electrical grid enables energy to flow from a large interconnected network and makes it nearly impossible to link a specific source of generation with a particular use. Still, it is possible to generalize over the types of energy consumed in a State and to use this information to characterize how a reduction in energy consumption leads to a reduction in pollution. The benefit of emissions reduction is then estimated using established economic valuation standards.

[9] These cost savings are additive to air pollution emissions savings from avoided energy generation (EPA, 2013).

[10] The L.A. County Department of Public Works in its Sun Valley Watershed Management Plan accounted for decreased energy demand for pumping water because the harvested and infiltrated water provide supplemental supplies. (EPA, 2013)

Air Pollution Emission Reduction: The total amount of reduction in criteria air contaminant emissions from a power plant is directly tied to the reduction in energy use in a specific location. Energy savings are readily converted to its emission rate reductions by utilizing data from EPA and other public sources. The economic value of lower air pollutants is inferred from its impact on human health and lower medical costs. The reduction of each type of criteria air contaminant has a different economic benefit value per ton. Evidence of the conversion of a reduction in emissions to economic benefits relies on published economic research and from Federal regulatory rule-making, in which values are ultimately approved by the US Office of Management and Budget.[11]

Greenhouse Gas Emission Reduction: Similar to criteria air contaminants, greenhouse gas emissions from energy generation also cause economic damages. The tons of greenhouse gas emissions are computed from the same data sources as criteria air contaminants. The value of lower greenhouse gas emissions is linked to a reduction in in long-term damage to the global economy. While the Federal government provides guidelines on the value per ton of greenhouse gas emission reduction, other agencies have used different values. For example, the Portland Bureau of monetized this reduction in carbon emissions due to cooling and heat savings in buildings with Ecoroofs (EPA, 2013).

2.2.4 Ecosystem Service Benefits

Green infrastructure such as green roofs, bio-swales and trees can also provide a number of additional environmental and ecosystem services. These include entrainment of air particulates, carbon sequestration and habitat creation. Each of these benefit categories is directly related to the plant material that is installed as part of the green infrastructure system. Accrual of benefits depends on a variety of design and site conditions though research is available to quantify some of the physical performance measures of green infrastructure. Estimation of economic benefits at a new site would in most cases require new research at that site since limited information has been broadly developed.

Air Particle Entrainment: Some green infrastructure systems have the ability to uptake pollutants directly from the environment, which reduces adverse human health impacts. The criteria air contaminant pollutants that can be entrained include nitrogen dioxide (NO_2), ozone (O_3), sulfur dioxide (SO_2) and particulate matter classifies as PM10.[12] Key drivers of these benefits include the amount (in square footage, or number of trees) of green infrastructure, as well as the current levels of criteria pollutants, and size of the local population, especially those whose health is more vulnerable to environmental conditions. The quantified amount of pollutants

[11] Many economic values originally come from regulatory rule-making in which an economic analysis is reviewed and ultimately accepted by the Office of Management and Budget before the rule becomes a law.

[12] The Charlotte-Mecklenburg Storm Water Services, serving an area of 526 square miles, included these entrainment benefits when analyzing their reforestation in their LID/GI approach, as it is relatively inexpensive but offers large benefits in terms of air quality and storm water management, the county has simply committed to making reforestation a priority (EPA, 2103)

entrained can be monetized using the same economic values per ton that are applied in the air pollution emission reduction calculations.

Carbon Sequestration: Carbon sequestration is the process of storing carbon in biomass and soils as atmospheric carbon dioxide is taken up by trees, grasses, and other plants through photosynthesis. The amount that can be sequestered is dependent on the above ground biomass of the tree, green roof or bio-swale. Sequestration benefits only last as long as the plants or trees are alive and that they vary with the age of the vegetation. Carbon sequestration rates depend on the type of species and location where it is grown (Pepper, 2012). Carbon sequestration in green roofs can have high variability due to roof age and substrate depth.[13] Other factors that affect carbon sequestration in green roofs are geographic region, plant species and roof management or maintenance (Getter, K. L. et al., 2009; Wise, S. et al., 2010; City of Portland BES, 2010; CNT, 2010). In addition, healthy and large trees can store about 1000 times more carbon than smaller trees and if those trees have a long lifespan they also tend to be the biggest contributor to carbon removal (Nowak, D. J. & Crane, D. E., 2001; Escobedo, et. al. 2012; McPherson, E. G. et al., 2007; CNT, 2010). The value of carbon sequestration is estimated with the same benefit parameters as with greenhouse gas emissions.

Habitat Related Benefits: Green roofs, rain gardens and other vegetated infiltration systems can improve the habitat for flora and fauna, such as bird and insect species. These different types of habitats are usually small in size and have limited impacts. But, it is conceivable that greater benefits may arise from large-scale strategies that are connected to habitat corridors. Limited research is available to directly assess the economic value of habitat creation. As a first step, a biological survey would be required to assess current conditions and to evaluate potential changes in flora and fauna habitat and other ecosystem services. Valuation of these changes though would remain difficult because of a lack of economic research on the benefits of small scale habitats. Potential proxy values may be drawn from wetland valuation research for some types of green infrastructure, but developing accurate estimates would be highly uncertain. Still, in some studies such as the benefit cost analysis in Ann Arbor, the value of habitat creation is estimated (ECONorthwest, 2011).

[13] One study indicated that three roofs with similar substrate depth had increased carbon with age of the roof and vegetation. Data from another study showed green roofs stored, on average, between 60 to 240 grams of carbon per square meter in the aboveground plant and between 30 and 185 g C·m-2 in belowground biomass.

2.2.5 Community Livability Benefits

A series of quantifiable and qualitative benefits also enhance the quality of life across a community. Emerging research on these benefits stems in part from the ways in which *social capital* forms and grows in a community. For example, the Portland Bureau of Environmental Services writes "social capital is the benefits that individuals and communities derive from having social contacts and networks throughout their communities and is based on the notion that individuals who interact with each other will support each other to the benefit of the entire community" (Portland BES, 2010). Green infrastructure, and especially ones that encourage use of the outdoors, can help induce interactions and connections across the community. This includes the personal value of health and recreation, as well as an improvement in the level of investment in business district.

Reduced Health Effects - Heat Island Related Impacts: The term "heat island" describes a landscape characteristic in which cities tend to be hotter than nearby rural areas.[14] These hotter temperatures come from the radiant heat off of impervious surfaces and buildings, and a lack of plant material to produce evapotranspiration that cools the air (EPA, 2008; Grimmond, C. et al., 2010; Wise, S. et al., 2010; Burden, D., 2006; City of Portland Bureau of Environmental Services, 2010; Grimmond, C. et al., 2010; and Stratus Consulting Inc., 2009). Across a city, higher temperatures can lead to adverse health effects on people (e.g. respiratory difficulties, exhaustion, heat stroke and heat-related mortality), particularly older and more vulnerable populations.[15] Green infrastructure can reduce temperatures and lead to lower health effects if implemented widely across a city. Urban trees, for example, emit low volatile organic compounds (VOC), and reduce air temperatures through transpiration. Research has shown that trees can reduce local temperatures up to 8.7°F compared to impervious surfaces. In Chicago, a study showed substantial differences in roof surface temperatures between green and conventional coverings. The effect of green infrastructure on mitigating heat island effects depends on wide scale implementation (Stratus, 2009). Data on the demographics of an area also influence related benefits because certain age cohorts are more susceptible to heat related illnesses than others.

Aesthetic Improvements: Some strategies improve the overall visual appearance of a community simply by having planted material among impervious surfaces. In addition, some BMPs strategies aim to directly reduce litter or debris from public spaces to make it more visually appealing. These aesthetic improvements are difficult to estimate directly but can be observed in differences in the prices on properties which are in the vicinity of aesthetically attractive areas. To estimate benefits of these improvements, property value studies are conducted to isolate only a small portion of price differences that relate to being near the green

[14] http://www.epa.gov/heatisland/index.htm

[15] The heat island mitigation to lowering emission levels of air pollutants and greenhouse gases through the reduced energy demand (via greater air conditioning needs) and lower demand for outdoor irrigation needs. These effects, if they can be quantified, are discussed above.

infrastructure installation. A number of researchers have evaluated such property value differences and used them in BCAs. For example, the Alachua County Environmental Protection Department and Public Works Department (in Florida) examined the changed in property values due to the county's green infrastructure programs and found that the increase in land values for properties adjacent to some measures (EPA, 2103). The application of findings from one site to another is not always straightforward and depends on site specific conditions.

Recreational Benefits: In addition to providing a pleasant visual experience, certain green infrastructure can provide recreational benefits as well. Philadelphia estimated the number of persons who would use (i.e. walk or bike on) a vegetated acre, as part of their triple bottom line analysis of the Combined Sewer Overflow Long Term Control Plan Update (PWD, 2009). The residents of Alachua County in Florida noted that recreational benefits that stem from green infrastructure were a top priority for the impacts of development. Their concerns for these issues have driven the county's pursuit of GI programs (EPA, 2013). For the Blackberry Creek Watershed Alternative Study, open spaces and natural greenways to preserve and connect significant natural features for valued for aesthetic, recreational, and/or alternative transportation uses (EPA, 2013). Valuation of recreational features stems from economic research on the time and money spent to reach a recreational area.

Noise Reduction: Some green infrastructure systems, such as wetlands or trees, are effective in reducing ambient noise because they can absorb it. CNT (2010) discusses the noise-reducing properties of GI for porous concrete and green roofs, but does not provide a methodology for quantifying these benefits. A case study in Lancaster County, PA notes that positive effects of green infrastructure can arise from noise pollution reduction (EPA, 2014).

Crime Reduction: Researchers from the University of Illinois asked the question "Does Vegetation Reduce Crime?" and came to the conclusion that the greener a buildings surroundings were, the fewer crimes reported (Kuo and Sullivan, 2001). This study examined crime activity levels around apartment buildings in Chicago, and measured differences in the amount of trees and grass cover between sites. Vegetation may deter crime both by increasing informal surveillance and by mitigating some of the psychological precursors to violence. While these are just theories and have not been comprehensively examined, what this research shows is that vegetation does not necessarily facilitate crime by providing cover – a long-held belief among some planners. Instead, a green environment encourages outdoor use, and as such, provides a deterrent because more people are in places where crimes can be committed. The benefits of crime reduction would be derived through data per crime on the avoided costs for the judicial system.

Public Education/Environmental Stewardship. Promoting strategies that seek to change people's behaviors and make them more aware of their environmental impacts helps to cultivate a stewardship perspective in the community about its

local natural resources. CNT (2010) notes that community tree planting provides a valuable educational opportunity for residents since in this process they become more aware of the benefits of green infrastructure. Research on urban tree planting has shown that such environmental initiatives make environmentally sound behaviors more likely to occur in the future. Other strategies involving public education and advertising has appeared to be less effective in changing attitudes (Kuo and Sullivan, 2001; and Summitt and Sommer, 1997). The economic valuation of such changes though has not been sufficiently studied for it to be included in a BCA. In this case, only a qualitative assessment of changes in stewardship could be included in a decision framework.

Business Development: Green infrastructure, especially on the scale of a comprehensive green street design can lead to an enhanced sense of place, and increase in foot and bicycle traffic can support retail development. The NRDC found that consumers are willing to spend more on products, visit more frequently, or travel farther to shop in areas with attractive landscaping, good tree cover, or green streets (NRDC, 2013). Case studies by the New York City DOT examined before and after changes in Retail Sales Tax Filings, Commercial Leases & Rents, and City−Assessed Market Value. While the study's methodology does not ultimately prove causality between the street improvement projects and any resulting economic changes, some locations of green street development saw a significant increase in retail sales compared to the changes in retail sales for the borough as a whole.

Job Creation and Economic Impacts: Spending on capital investments and operations and maintenance (O&M) leads to job creation. Moreover, since installation and maintenance of most of these systems requires unskilled labor, the economic benefits of job creation often goes directly to those who may be in most need of work. The total economic impact of capital and O&M expenditures is measured in terms of the number of jobs created, change in income, gross regional product, and sales and property tax revenue. In addition, wider impacts across the region can also be estimated by applying appropriate economic *multipliers*. As an example, PWD (2009) focused on the fact that many of these jobs are for unskilled labor, which provides a valuable social benefit in an urban setting.

2.3 What Evidence Of Benefits Have Been Found Elsewhere?

Economic benefits of storm water management depend on site conditions and characteristics of the green infrastructure systems and program. While CNT (2010) establishes a number of methods for computing benefits, for each set of calculations it is necessary to collect (or establish assumptions) site specific data about BMPs performance and establish analytical standards for the suitability of economic valuation parameters. Despite these constraints and uncertainties, some agencies have pushed forward in collecting data and using these methods. The most recent review of economic evaluations of green infrastructure is found in EPA (2013). This document has developed a fairly comprehensive assessment of the efforts by some utilities to evaluate economic benefits of storm water management. Table 3 presents an excerpt from the EPA (2013) report and indicates that some of case studies performed BCAs, as opposed to other analytical approaches such as cost-effectiveness.

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Table 3: Excerpt of EPA Case Studies on Economic Evaluation of Storm water Management BMPs

Entity	LID/GI program description	Type of analysis	Outcome of analysis
Lenexa Public Works Department, KS	Adoption of LID/GI-oriented development standards, BMPs, and systems development fees as part of the Rain to Recreation program.	Capital cost assessment	Savings of tens to hundreds of thousands of dollars in site work and infrastructure costs with GI BMPs.
Charlotte-Mecklenburg Storm Water Services, NC	Restoration of streams damaged by runoff from development, and BMPs to reduce impacts of rapid development, were assessed to determine impacts on drinking water quality.	Cost-effectiveness	Analysis showed that stream restoration is the most cost-effective way to immediately control sediment in this area.
Capitol Region Watershed District (CRWD), MN	Eighteen BMPs in a 298-acre watershed designed to reduce localized flooding and storm water runoff, improve water quality, enhance recreation in local park.	•Capital cost assessment •Cost-effectiveness	Initial capital cost assessment found substantial cost savings with GI compared with grey infrastructure.
New York City Mayor's Office of Long-term Planning and Sustainability, NY	Distributed GI controls to reduce storm water runoff and CSOs, improve water quality, and increase public access to tributaries, compared to conventional CSO controls such as tunnels and basin storage.	Cost-effectiveness	Cost savings with GI compared to grey infrastructure
Seattle Public Utilities (SPU), WA	Natural drainage system (NDS) projects on residential streets; LID/GI-based storm water regulations and Residential Rainwise Program to encourage customers to reduce the volume of storm water sent to the public system.	Cost-effectiveness	By integrating LID/GI into asset management process, SPU can minimize life-cycle costs to meet established levels of service and balance the risks to minimize life-cycle costs.
West Union, IA	Pilot community for Iowa Sustainable Green Streets Initiative to replace aging infrastructure and reduce localized flooding in downtown area.	•Life-cycle cost analysis •Benefit valuation (avoided costs)	Lower maintenance and repair costs for deicing permeable pavement result in projected savings over the life-span of the pavement.
Kirkland Public Works Department, WA	Integration of LID/GI into conceptual design phase of all capital improvement projects within public rights-of-way.	Quantitative ranking of costs, benefits	LID/GI options for CIP projects are investigated as early in the planning phase as possible.
Kane County, IL	Adoption of county storm water ordinance and corresponding LID/GI-based BMPs, including development approaches that preserve natural areas and use naturalized drainage/retention/detention (i.e., conservation-based development).	Fiscal impact analysis	Study found that conservation development alternative incurs a lower public cost than the conventional alternative.

Table 3: Excerpt of EPA Case Studies on Economic Evaluation of Storm water Management BMPs (Continued)

Entity	LID/GI program description	Type of analysis	Outcome of analysis
Milwaukee Metropolitan Sewerage District (MMSD), WI	Integration of distributed LID/GI strategies into overall planning efforts including facilities plans and CSO control plan; projects on both public and private lands.	•Cost effectiveness •Benefit valuation	Results will be used to help select which projects to implement in the future, and to show where the use of GI is a valid and effective approach
Alachua County Environmental Protection and Public Works Departments, FL	County acquires and preserves open-space lands through ACF program to reduce development impacts and improve water quality.	Benefit-cost analysis (BCA)	Proximity to open space adds to parcel value, for an increase in property tax revenue of several million dollars per year.
Portland Bureau of Environmental Services (BES), OR	Ecoroof Program includes incentives for green roofs on privately owned buildings and green roof requirements for new city-owned buildings.	BCA analysis	Ecoroofs generate significant public and environmental benefits, as well as benefits to developers and building owners (due to extended life of ecoroofs compared to traditional roofs).
Sun Valley Watershed, LACDPW, CA	Goal of watershed-based project was to alleviate localized flooding while providing multiple benefits. Fifteen project elements with LID/GI components.	BCA analysis	Demonstrated potential for multi-objective storm water strategies to provide greater community value than a single-objective flood control strategy would provide.
PWD, PA	Green City Clean Waters Program aims to reduce CSOs and improve water quality in part through distributed GI controls and comprehensive stream restoration program.	BCA analysis	LID/GI-based approaches provide important environmental and social benefits that are generally not provided by grey infrastructure.

A summary of several case studies is presented below. These studies integrated local data with some aspects of the CNT (2010) framework to estimate quantifiable benefits.

Economic Benefits of Green Infrastructure in Milwaukee, WI and Ann Arbor, MI: ECONorthwest (2011), evaluated benefit analyses of storm water management efforts in Milwaukee, WI and Ann Arbor, MI. In *Milwaukee,* the Department of Public Works - Infrastructure Division, manages infrastructure consisting of about 300 miles of sewer pipes, 3,000 miles of municipal pipes, and 3,000 miles of private laterals. A primary focus is to reduce the quantity of total suspended solids entering its waterways by 40 percent by 2013, as required by the Wisconsin Department of Natural Resources (City of Milwaukee, 2011). The Systems Planning Unit in Ann Arbor has a much smaller management responsibility and consists of just 359 miles of underground pipes and over 11,000 inlets and catch basins to manage storm water (City of Ann Arbor, 2011). In both communities, monetizable, quantifiable and qualitative benefits are evaluated (see Table 4) using the methodology established by CNT (2010). Where appropriate and possible, local data was integrated into calculations to estimate benefits. A number of additional assumptions are made to illustrate the scale of benefits that could arise from a much larger future program.

Table 4: Benefits Evaluated in Great Lakes Study

Quantified and Monetized	Quantified, but not Monetized	Qualitative
Avoided costs of reduced storm water runoff and water quality	Flood Reduction	Public Education
Avoided costs related to water quality benefits	Heat Island Effect	
Avoided costs of additional future gray infrastructure capacity	Aesthetics	
Avoided costs of treatment operations and maintenance for combined sewer flows	Improved health and well-being from recreation	
Energy Cost Savings Benefits	Improving well-being by reducing noise pollution	
Decreased air pollution emissions from reduced energy use		
Improved air quality from vegetation on green roofs and trees		
Reduced CO2 equivalent emissions from reduced energy use		
Increased carbon sequestration from trees and green roofs		
Wetland habitat protection		

Economic Benefits of Green Infrastructure in Lancaster, PA: With a population of 60,000, the city has a combined sewer system (CSS) and needed to address burden on the treatment facility when intense precipitation events occurred. The EPA notes that combined sewer overflows (CSOs) discharge approximately 750 million gallons of untreated wastewater and storm water into the Conestoga River (EPA, 2014). To address this issue, Lancaster County published a Green Infrastructure plan which estimated water quality benefits, but not the additional environmental, social, and economic benefits. The EPA published this case study to highlight and bring awareness to quantify and highlight these benefits. The specific benefits they monetized were energy, air quality, and climate-related benefits. They also estimated the avoided capital costs of gray infrastructure, and the avoided wastewater pumping and treatment costs. The methodology used in quantifying and monetizing the benefits followed CNT (2010). They also made several high-level assumptions with regard to long-term reduction, the future distribution of green infrastructure projects, and when the monetary benefits would begin accruing.

Philadelphia Combined Sewer Overflow Long Term Control Plan Update: The purpose of the City's report was to demonstrate the full range of societal benefits of the Green City Clean Waters Program. The program aims to reduce CSOs and improve water quality in part through distributed GI controls and comprehensive stream restoration program. The analysis helped PWD to determine that a GI-based approach, coupled with targeted grey infrastructure, is their preferred approach for city to follow. A table of the monetized benefits over 40 years is presented below. It is assumed that these benefits arise from a 50% level of LID coverage throughout the city.

Table 5: City-wide present value benefits of key CSO options: Cumulative through 2049 (2009 Dollars)

Benefit categories	Value
Increased recreational opportunities	$524.50
Improved aesthetics/property value (50%)	$574.70
Reduction in heat stress mortality	$1,057.60
Water quality/aquatic habitat enhancement	$336.40
Wetland services	$1.60
Social costs avoided by green collar jobs	$124.90
Air quality improvements from trees	$131.00
Energy savings/usage	$33.70
Reduced (increased) damage from SO2 and NOx emissions	$46.30
Reduced (increased) damage from CO2 emissions	$21.20
Disruption costs from construction and maintenance	($5.60)
Total	$2,846.40

Alachua County Environmental Protection and Public Works Departments, FL: The county developed a comprehensive low impact development (LID) / green infrastructure (GI) program based on three different components: (1) LID/GI-based land development policies and regulations developed through the county's Comprehensive Plan; (2) Alachua County Forever (ACF), a conservation and land acquisition program; and (3) a unique governance structure designed to increase interdepartmental collaboration to promote the adoption of LID/GI program elements. To demonstrate the benefits of ACF and alleviate public concerns that the program reduces property tax revenue, the county calculated the benefits for the increase in property values from increased open space. This measure was used to compare with any lost tax revenue to acquire, protect, and manage environmentally significant lands in order to protect water resources, wildlife habitat, and natural areas suitable for resource-based recreation. Twelve thousand seven hundred parcels in the county are close enough to open space to show an increase in value due to their proximity to water. The total impact on their value is just under $150 million, which would result in additional property tax revenues of approximately $3.5 million per year.

Portland Bureau of Environmental Services, OR. The Portland BES performed an analysis of ecoroofs versus conventional roofs to gain support and increase implementation of ecoroofs in the city. Portland receives an average of 37 inches of precipitation per year, which creates an annual volume of storm water runoff of about 10 billion gallons. As part of its storm water management programs, BES has implemented the Sustainable Storm water Management Program, which focuses on green infrastructure initiatives, including the Ecoroof Program.

Table 6: Value of Benefits from 40,000 SQFT Ecoroof (2008 Dollars)

Benefit categories	Total Over 40 Years
Cooling demand reduction	$19,983
Heating demand reduction	$23,509
Carbon reduction	$845
Improved air quality	$104,576
Habitat creation	$25,300
Total	$174,213

Sun Valley Watershed, Los Angeles, California: The Sun Valley watershed is in the San Fernando Valley, about 14 miles northwest of downtown Los Angeles. It encompasses the communities of Sun Valley and North Hollywood. The watershed is approximately 4.4 square miles and six miles in length from north to south.

The economic analysis was undertaken because the county and other stakeholders needed to show that although the costs of the LID/GI-oriented solutions would be much greater than the cost of traditional infrastructure, and they would yield significantly higher benefits. The results of the analysis were used to help to gain public support, bring in outside partners, and raise funds. The tables below show the descriptions of each alternative the value of alternatives compared to a grey infrastructure scenario.

Table 7: Description of Alternatives for Sun Valley Watershed

	1 - Infiltration	2 - Water Conservation	3 - Storm water Reuse	4 - Urban Storm Protection
Description	Widely Distributed Small Projects	Maximizes Wildlife Habitat	Maximizes Storm water Reuse for Industry	Full Conveyance with Regional BMPs
Retention Basin Size	50-Year	50-Year: Subareas 1-6 10-Year: Subareas 7-8	50-Year	10-Year

Table 8: Values by benefit over 50 years (2002 Dollars)

Benefit	Grey Infrastructure	1	2	3	4
County Flood Control					
Regional damage avoidance	$64.46	$64.46	$64.46	$64.46	$64.46
Change in downstream flooding	-$1.03	$5.37	$3.65	$5.37	$3.22
City Flood Control	$10.01	$10.01	$10.01	$10.01	$10.01
Avoided cost of imported water	$0.00	$22.35	$17.89	$24.07	$22.65
Energy Reduction	$0.00	$4.30	$1.70	$4.30	$1.70
Air Quality	$0.00	$20.50	$8.10	$20.50	$8.10
Greenwaste	$0.00	$20.00	$10.00	$20.00	$10.00
Ecosystem Restoration	$0.00	$1.86	$4.04	$4.58	$4.48
Recreation	$0.00	$23.34	$23.34	$23.34	$23.34
Property Values	$0.00	$10.20	$3.90	$10.20	$3.90
Total Benefits	**$73.44**	**$270.47**	**$295.39**	**$274.93**	**$239.95**

3 Summary of Water Quality Improvement Strategies

3.1 Program Background

The Division has been working for several years with other jurisdictions and community groups to establish Water Quality Improvement Plans (WQIPs) for each of its watersheds. WQIPs draw from the processes in developing Watershed Asset Management Plans (WAMPs) and Comprehensive Load Reduction Plans (CLRPs) which aim to protect, preserve, enhance, and restore water quality in receiving waters. WAMPs provide an understanding of critical assets owned by the Division and the management and investment strategies necessary to deliver required services. CLRPs are efforts to identify BMPs and funding levels needed to comply with TMDL and other storm water regulations established by the Regional Water Quality Control Board. These efforts, as described below, have identified a series of projects and initiatives that have been defined as either structural or nonstructural initiatives.

3.2 Structural WQIP Strategies

3.2.1 Types of Strategies

Structural BMPs are physical infrastructures that are designed for site-specific conditions and placed strategically across a watershed to improve water quality. The effectiveness and feasibility of implementing any of these BMPs varies depending on the design and site conditions. For example, the effectiveness of a BMP in enhanced infiltration capacity of a watershed depends on amenable soil types. Other site-specific considerations include the physical land area available for effective implementation and maintenance. Also, the capital and maintenance costs of a BMP influence its feasibility for the Division, especially in comparison to other BMPs which can be implemented more cost-effectively.

Various types of structural strategies have been identified as potentially suitable for San Diego watersheds and have been classified as one of three types: (1) green infrastructure, (2) multiuse treatment areas, and (3) water quality improvement BMPs.[16] Each of these types of structural BMPs is discussed below.

Green Infrastructure

Green infrastructure covers a range of BMPs that are designed to be integrated in a broader site plan to maintain healthy waters, provide multiple environmental benefits, and support sustainable communities. Green infrastructure is distinguished from other methods by making deliberate and effective use of vegetation and soil to manage storm water (USEPA, 2014). Table 9 presents a series of green infrastructure BMPs that can be integrated into site designs and implemented at the site scale (on-site treatment) or street right-of-way scale (green streets).

[16] San Dieguito Potential Strategies Final Draft 4/11/14

Table 9: List of Structural BMPs – Green Infrastructure

BMP*	BMP Description
Bioretention	Shallow vegetated features constructed in green spaces alongside roads, sidewalks, and other paved surfaces. Bioretention includes an engineered soil media designed to encourage pollutant treatment and water storage.
Infiltration Trenches	Narrow, linear BMPs that have similar functions as bioretention areas with variable surface materials, including rock or decorative stone, designed to allow storm water to infiltrate into subsurface soils.
Bioswales	Shallow, open channels designed to reduce runoff volume through infiltration and pollutant removal by filtering water through vegetation within the channel and infiltration into bioretention soil media. Bioswales can serve as storm water conveyance, but the primary objective is water quality enhancement (often referred to as linear bioretention).
Planter Box	Fully contained system containing soil media and vegetation that functions similarly to a small biofiltration BMP, but includes an impermeable liner and underdrain.
Constructed Wetland	Engineered, shallow marsh systems designed to control and treat storm water runoff. Particle-bound pollutants are removed through settling and other pollutants are removed through biogeochemical activity.
Permeable Pavement	Allows streets, parking lots, sidewalks, and other impervious covers to retain their natural infiltration capacity while maintaining the structural and functional features of the materials they replace. Roads such as highways can include PFC overlays which provide water quality benefits when traditional permeable pavement is not suitable.
Sand Filters	Treatment systems that removes particulates and solids from storm water runoff by facilitating physical filtration.
Vegetated Swales	Shallow, open channels that are designed primarily for storm water conveyance. Pollutants such as trash and debris are removed by physically straining/filtering water through vegetation in the channel.
Vegetated Filter Strips	Bands of dense, permanent vegetation with a uniform slope, designed to provide pretreatment of runoff generated from impervious areas before flowing into another BMP as part of a treatment train.
Green Roofs	Roofing systems that layer a soil/vegetative cover over a waterproofing membrane and can reduce runoff through interception and evapotranspiration.

*Source: San Dieguito River WMA Water Quality Improvement Plan (2014)

Table 10 outlines the expected levels of effectiveness in green infrastructure in handling different types of impacts of storm water, including water chemistry and physical and biological impacts. This chart is adapted from the San Dieguito River WMA Water Quality Improvement Plan (2014) provides an initial indication of the kinds of benefits (beyond water quality improvements) that can be achieved by green infrastructure BMPs. In particular, while trash removal is a water chemistry benefit, its removal from streets can lead to more aesthetically pleasing neighborhoods, which in turn can foster economic value. In addition, depending on the extent to which these BMPs improve physical and

biological factors, there can be follow-on improvements in recreational value and ecosystem value of streams and riparian areas. It is noted here that only constructed wetlands have the potential to generate tangible improvements in habitat or wildlife.

Table 10: Green Infrastructure BMPs and Pollutant Reduction BMP

	Water Chemistry Benefit									Physical and Biological Benefits			
	Bacteria[1]	Metals	Organics	Sediment	Pesticides	Nutrients	Oil and grease	Dissolved minerals	Trash	Flow rate	Volume reduction	Habitat or Wildlife	Aquatic Life
Bioretention	●	●	●	●	●	◗	●	◗	●	●	●	○	◗
Infiltration Trenches	●	●	●	●	●	●	●	●	●	●	●	○	●
Bioswales	●	●	●	●	●	◗	●	◗	●	●	●	○	◗
Planter Boxes	●	●	●	●	●	◗	●	◗	●	◗	◗	○	◗
Permeable Pavement	◗	●	◗	●	●	◗	◗	◗	◗	●	●	○	◗
Constructed Wetlands	●	●	◗	●	●	●	◗	◗	●	●	◗	●	◗
Sand Filters	●	●	●	●	●	◗	●	○	●	◗	◗	○	◗
Vegetated Swales	◗	◗	◗	●	◗	◗	◗	○	●	◗	◗	○	◗
Vegetated Filter Strips	◗	◗	◗	●	◗	◗	◗	○	●	◗	◗	○	◗
Green Roofs	◗	◗	○	●	○	○	○	○	○	●	◗	○	◗

Key: ● - Primary pollutant reduction; ◗ - Secondary pollutant reduction; ○ - Minimal or no pollutant reduction.

Multiuse Treatment Areas

San Dieguito River WMA WQIP (2014) identifies large-scale treatment areas such as multiuse basins and stream, channel, and habitat rehabilitation projects. These systems are designed as regional facilities that can receive flows from neighborhoods or larger areas and become cost-effective solutions that provide multiple benefits. For example, such systems can be integrated in public spaces such as active (soccer fields) and passive (parks) recreation areas and provide benefits in flood control, ground water recharge, restoration, habitat enhancement, and recreation. In addition streambank projects that reduce erosion can improve water quality and simultaneously improve habitat. Table 11 defines the list of measures considered in San Dieguito River WMA WQIP (2014).

Table 11: List of Structural BMPs – Multiuse Treatment Areas

BMP*	BMP Description
Infiltration and Detention Basins	Large multiuse surface BMPs (on public parcels) that provide treatment through the runoff detention and infiltration (e.g. infiltration basins and dry extended detention basins). These BMPs are designed to hold runoff for an extended period of time to allow water to evaporate into the atmosphere, infiltrate into native soils, or be transpired by vegetation, while accommodating for overflow and bypass during large storm events.
Stream, Channel, and Habitat Rehabilitation Projects	Stream, channel, and habitat restoration or enhancement projects can help sustain habitat for wildlife and provide water quality benefits downstream of these activities.
Other Opportunities	Construction of multiuse treatment areas BMPs on private land to achieve the load reductions. These BMPs are the cost effective and considered a low priority.

Water Quality Improvement BMPs

Additional structural BMPs include systems that supplement the design performance of existing infrastructure. For example, systems that segregate trash includes inlet devices, such as trash guards or racks that capture debris before they enter surface waters. Another example are proprietary commercial products that often aim to use settling, filtration, absorptive/adsorptive materials, vortex separation, and sometimes vegetative components to remove pollutants from runoff. Finally, dry weather flow separation and treatment projects target non-storm water dry season flows and divert these flows for treatment either on-site or to sanitary sewer systems and ultimately waste water treatment plants.

3.2.2 Measuring Impacts of Structural Strategies

The benefits of structural systems - both the type of benefit and the magnitude – depend on the system's design and surrounding site characteristics. Some strategies such as constructed wetlands can generate a range of benefits (which are partially indicated by Table 10) and may also include recreational and aesthetic values. Most of these benefits accrue to the general public who may have access or benefit from proximity to the wetland. Green roofs, on the other hand, create both public benefits in water retention as well as potential private benefits for property owners in terms of energy savings, from additional roof insulation.

The effectiveness of each structural system in generating benefits is determined directly from key physical features associated with its design. That is, each system benefit, whether it includes flood risk reduction, air quality improvement, or aesthetics, depends on a characteristic of the system that is measured in physical units. For example, flood risk reduction benefits depend fundamentally on the quantity of water retained by the BMP – that benefit's *unit of measure*.

The unit of measure of green streets (Figure 1) would certainly include the designs of various BMPs on the street such as bio-swales, permeable pavement and tree plantings.

In aggregate however, a standard green street design would be measured by its length in miles. In addition, the features and length of the green street may also influence the value of properties on either side of it. Site specific characteristics associated with the type of neighborhood (e.g. mixed use, residential, commercial, etc.), population / employment density, socio-economic characteristics (e.g. income, household size), safety conditions and other factors could influence different types of benefits.

Figure 1: Illustration of Sample Structural BMP: Green Streets

Bioswales: can reduce runoff and downstream flood potential and create aesthetically appealing environment

Permeable Pavement: can reduce runoff and downstream flood potential

Tree Plantings: can reduce runoff and downstream flood potential, entrain harmful particulates, create aesthetically appealing environments, lower ambient temperatures

3.3 Nonstructural Strategies

3.3.1 Types of Strategies

The Division and its stakeholders have also identified nonstructural strategies that may achieve water quality improvements. Nonstructural strategies include “those actions and activities intended to reduce storm water pollution, which do not involve construction of a physical component or structure to filter and treat storm water.” These strategies include administrative policies, creation and enforcement of municipal ordinances, education and outreach programs, rebate and other incentive programs, and cooperation and collaboration with other watershed or regional partners. In general, many of these initiatives have been implemented by the Division for many years and are considered to be integral to regulatory compliance on a watershed-specific basis.

WQIP documents have organized Nonstructural Strategies into a number of categories (see Table 12). These categories include: Development Planning, Construction Management, Existing Development, Illicit Discharge, Detection, and Elimination (IDDE) Program, Public Education and Participation, Enforcement Response Plan, and Non-JRMP Strategies. Across the watersheds and jurisdictions, a long list of potential nonstructural strategies in each category has been developed – reflecting the differing site characteristics in different locations. A comprehensive list of specific strategies across all of the watersheds is included in Appendix 2.

Table 12: Nonstructural Strategies

Strategy Category	Strategy Description
Development Planning	Program uses Responsible Agencies' land use and planning authority to require implementation of best management practices (BMPs) to address effects from new development and redevelopment.
Construction Management	Program addresses pollutant generation from construction activities associated with new development or redevelopment.
Existing Development	Program addresses pollutant generation from existing development including commercial, industrial, municipal, and residential land uses. It includes stream, channel, and habitat restoration and retrofitting in areas of existing development.
Illicit Discharge, Detection, and Elimination (IDDE) Program	Program actively detects and eliminates illicit discharges and improper disposal of wastes into the MS4.
Public Education and Participation	Promotes and encourages the development of programs, management practices, and behaviors that reduce the discharge of pollutants in storm water to the maximum extent practicable (MEP), prevent controllable non-storm water discharges from entering the MS4, and protect water quality standards in receiving waters.
Enforcement Response Plan	Enforcement of each JRMP is required.
Non-JRMP Strategies	Strategies that are outside of the JRMPs, but are designed to effectively prohibit non-storm water discharges to the MS4, protect the beneficial uses of receiving waters from MS4 discharges, or achieve the interim and final numeric goals identified in the Water Quality Improvement Plan.

3.3.2 Measuring Impacts of Nonstructural Strategies

The economics perspective on nonstructural strategies is manifested in the change that they create, which in turn causes a change in value for the community. In particular, the impact of some nonstructural strategies that are directly related to structural systems, such as new design standards for BMPs, generates value when the design standard is used to improve BMP performance. The value of this nonstructural strategy is captured through the value of the structural systems that are implemented. Other nonstructural strategies directly generate value that is separate from a structural BMP. For example, an educational campaign that aims to reduce litter would directly target people's behavior and its effectiveness would be determined by how many people's behavior is changed. The value of this change would be captured by benefit categories associated with improved community livability and business development.

To reflect these differences in nonstructural strategies, we have developed several categories to differentiate them in terms of how they generate value. These categories include strategies that: (a) Increase # of structural systems; (b) Improve structural systems performance; (c) Initiatives to change behavior; and (d) Initiatives to reduce pollutants directly. The revised grouping of specific nonstructural strategies is briefly described in Table 13.

Table 13: Nonstructural Categories by Type of Impact and Identified Strategies

Changing Behavior to reduce pollutants at the source
Implement pet waste program
Identify and reduce incidents of power washing discharges from nonresidential sites.
Require BMPs to address pesticides, herbicides, and fertilizers issues
Implement Illicit Discharge, Detection, and Elimination (IDDE) Program
Implement a public education and participation program
Enhance education and outreach
Technical education and outreach on the MS4 Permit and WQIP
Implement escalating enforcement responses to compel compliance
Continue participating in source reduction initiatives.
Improve / Maintain BMPs or LIDs
Update BMP Design Manual procedures
Administer an alternative compliance program
Oversee implementation of BMPs during the construction
Require implementation of minimum BMPs for existing development
Gather monitoring information about priority conditions or beneficial uses
Collaborate with entities potentially including, but not limited to:
Increasing # of BMPs or LIDs
For all development projects, ensure source control BMPs
Amend municipal code to encourage LID
Train staff on LID regulatory changes and LID Design Manual.
For PDPs, require implementation of on-site structural BMPs or LIDs
Promote and encourage implementing designated BMPs at residential areas.
Develop pilot project to identify and carry out site disconnections in targeted areas.
Promote and encourage implementation of designated BMPs in nonresidential areas.
Monitor for erosion, and slope stabilization on municipal property.
Identify sites for pilot study to test Permeable Friction Course (PFC)
Identify candidate areas for retrofitting projects
Identify areas for stream, channel, or habitat rehabilitation projects
Enforcement of actionable erosion and slope stabilization issues
Conduct a feasibility study on urban tree canopy (UTC) program
Removing pollutants or sources directly
Implement operation and maintenance activities
Implement controls to prevent infiltration of sewage into the MS4
Implement operation and maintenance activities for public streets

Require sweeping and maintenance of private roads and parking lots in targeted areas.
Develop a program to address and capture trash and debris.
Sanitation and trash management for persons experiencing homelessness.
Protect areas that are functioning naturally.

As mentioned above, the first two of these nonstructural categories relates directly to structural systems themselves. In this case, whether the change in BMP adoption is due to training in the community or general promotion of BMP adoption, the success of these strategies would be determined directly by how many additional BMPs are installed and then by the various benefits generated by their installation. Similarly, new design standards and performance monitoring would be measured by the improvement in the performance of installed structural systems.

On the other hand, nonstructural strategies can generate water quality and other benefits on their own. For example, some of these strategies entail education, enforcement and outreach activities which attempt to alter behavior that leads to water quality pollution. These strategies may at the same time lead to an overall aesthetically better environment with less litter on the street. In addition, programs to promote rain barrels and other water harvesting systems on private property can generate benefits to the property owner and the general public. Measured in terms of their water holding capacity, these systems have the potential to offset water demand for irrigation purposes which has the dual effect of reducing water costs for the owner and water treatment demand from the utility. Lower water demand would reduce energy demanded and associated pollutants.

Figure 2: Illustration of Nonstructural BMP: Water Harvesting

Irrigation costs savings: Quantity of water retained for irrigation purposes (retained water also reduces energy emissions from lower energy use at the water treatment plant)

Each of these types of strategies will be discussed in greater detail relative to the benefits that they can generate in the next chapter.

4 Accounting for Benefits of BMP Strategies in San Diego

Discussions above on the economic benefits of storm water management and the varied types of structural and nonstructural BMPs strategies under consideration by that the Division sets up the potential to evaluate strategies with an economic framework. The challenge in performing an economic analysis is that some benefits may not be quantifiable, let alone monetizable. In that case, the Division faces some options in how to account for benefits that are perceived to be relevant in decision making. This section begins with an outline of the types of benefits which could be applicable to different categories of strategies and then closes with a discussion on the options for analytically accounting for benefits with different levels of information.

4.1 Evaluation of Benefits for BMP Strategies

This assessment of the applicability of benefits to different BMP strategies represents an initial effort to characterize and differentiate BMPs by the value that they may create for the economy, environment and community. In a series of tables (Table 14) through Table 17), each category of benefit is evaluated relative to applicability for each type of structural and nonstructural strategy. This initial assessment determines for each strategy type whether a benefit can be: (a) monetized; (b) monetized but depending on site specific conditions; (c) quantified but not monetized; or (d) qualitatively evaluated.

To facilitate the review of these tables, a standard symbol key is created to establish how benefits may be evaluated for each strategy.

Key to Symbols for Table 14 through Table 17	
●	Monetizable
⦿	Monetizable, but site-specific
⊗	Quantifiable
O	Qualitative

The following delineation of how benefits can be evaluated for a general strategy can only be viewed as our initial assessment. Recall that Table 13 briefly identifies individual strategies under each of these major groups. At this stage, only a general indication of applicability of benefits is discussed. Further evaluation of benefits per strategy would be developed in a subsequent report.

4.1.1 Structural Strategies – Economic and Environmental Benefits

Table 14 represents the additional economic and environmental benefits that could arise from various structural strategies. As shown, many benefits are readily monetizable for *Green Infrastructure* strategies. This finding reflects the fact that much of the existing research that can be applied in San Diego has focused on the various BMPs identified as green infrastructure. Such research and the various storm water management BCA case studies that have been produced provide standardized methods, data, and evidence that can be applied to new sites and projects. As noted in the table, with some additional data on site conditions (e.g. evidence of flood risk, and irrigation demand, for example), many

of the green infrastructure systems have the potential to be monetized. Only benefits related to habitat creation would be unlikely to be monetized. The reason is that not only to these types of benefit calculations require detailed biological surveys, but predictions on the improvement in habitat services with green infrastructure are not well understood at present. Any assessment of monetary benefits would be highly uncertainty and thus, this type of benefit is better characterized in quantitative terms, such as in units of habitat area created.

Multiuse Treatment Area strategies differ from green infrastructure because of the scale and placement of these systems. Benefits can arise from these strategies, especially in flood control because of the volumes that can be potentially detained but the quantification of benefits depends on whether there is a downstream flooding risk. The planted material in these systems can provide benefits in air particulate entrainment, carbon sequestration, and habitat creation but the evidence is not established well enough to characterize these impacts in monetary terms. Other benefits would entail a qualitative assessment.

Water Quality Improvement strategies do not have as clear an impact on economic and environmental benefits as green infrastructure and multi-use treatment areas. For example, trash guards or racks that capture debris before they enter surface waters can improve fish habitat but do not have enough supporting documentation to clearly assess benefits from some of the improved livability characteristics. If less trash in surface waters can be attributed to less trash on neighborhood streets, associated benefits in business development and social capital could arise, but such a connection is not likely to be quantifiable.

Table 14: Structural Strategies – Economic and Environmental Benefits

Strategy	Green Infrastructure	Multiuse Treatment Areas	Water Quality Improvement
Flood Risk Reduction	⊙	⊙	⊙
Irrigation Cost Savings	⊙	○	○
Energy Cost Savings	⊙	○	○
Air Particulate Entrainment	●	⊗	○
Climate Impacts	●	⊗	○
Habitat Related Benefits	⊗	⊗	⊗
Air Quality Emission Reduction	●	○	○
GHG Emission Reduction	●	○	○

4.1.2 Structural Strategies – Community Livability Benefits

Community livability benefits from structural systems (Table 15) represent benefits which directly or indirectly enhance local development and quality of life. These benefits are

largely derived from the physical features of structural strategies in creating benefits to local residents and property owners. For example, green roofs are noted in their ability to provide noise insulation in a building and tree plantings along green streets can lead to local retail business development because the environment is a more pleasant place to shop.

Similar to economic and environmental benefits in the table above, the applicability of community livability benefits to *Green Infrastructure* also depends on site specific characteristics. For example, the influence of aesthetic improvements on property values usually depends on the type of neighborhood (e.g. residential, commercial, or mixed-use areas). In commercial districts, monetized benefits would be observed in property values, increased sales or employment levels.

The other types of strategies, *Multiuse Treatment Areas* and *Water Quality Improvements*, have fewer types of benefits which can be quantified, let alone monetized. *Multiuse Treatment Areas* certainly have the potential to be located in areas that by design can create recreational opportunities. However, the type of features at the site depends on how it can be used for recreational purposes. The choice of plant materials (e.g. tree species) at the site would affect aesthetics and heat island / health effects but it depends on the location and installation scale of these systems. For *Water Quality Improvements*, it is not clear if there are quantifiable benefits that extend beyond water quality improvements themselves and thus, these benefit categories may be evaluated only in qualitative terms.

Table 15: Structural Strategies – Community Livability Benefits

Strategy	Green Infrastructure	Multiuse Treatment Areas	Water Quality Improvement
Heat Island Effect	⊙	⊙	○
Aesthetics	⊙	⊙	○
Recreational Benefits	⊙	⊙	○
Noise Reduction	⊗	○	○
Business Development & Jobs	⊙	○	○
Crime Reduction	⊗	○	○
Public Education/ Environmental Stewardship	⊗	⊗	⊗

4.1.3 Nonstructural Strategies – Economic and Environmental Benefits

The potential applicability of economic and environmental benefits for *Nonstructural Strategies* is presented in (Table 16). As discussed above, some types of nonstructural strategies relate directly to structural systems by *Increasing the Number of Structural*

Systems and *Improving the Structural Systems Performance*. Accordingly, estimating monetary benefits in of these is directly linked to whether the influence of a nonstructural strategy on implementing a structural system can be quantified. If so, then benefits are assessed relative to the structural system itself. The assessment of benefit estimation in the first two columns is therefore similar to that of structural systems, assuming though that the effectiveness of these nonstructural strategies can be estimated.

The two other nonstructural approaches, *Initiatives to Change Behavior* and *Initiatives to Reduce Pollutants Directly,* generate benefits from their own effectiveness in changing behavior or pollution control initiatives. Initiatives to Change Behavior primarily target efforts to encourage improved environmental stewardship and storm water protection throughout the community. Various types of actions then that people may take who are more area of environmental impacts include adoption of rain barrels, reducing litter, and reducing unnecessary levels of pesticides, herbicides and fertilizers. These types of activities could generate a range of economic and environmental benefits, some of which can be monetized if there is sufficient site specific information. In addition, *Initiatives to Reduce Pollutants Directly*, including a number of public agency initiatives in street sweeping, storm water system maintenance and trash removal, can also generate quantifiable and monetizable benefits. On the other hand, street sweeping initiatives entail some amount of environmental costs (or “negative benefits”) associated with emissions from vehicle use. These costs could be compared with any benefits created from cleaner streets.

Table 16: Nonstructural Strategies – Economic and Environmental Benefits

Strategy	Increase # Of Structural Systems	Improve Structural Systems Performance	Initiatives to Change Behavior	Initiatives to Reduce Pollutants Directly
Flood Risk Reduction	⊙	⊙	⊙	○
Irrigation Cost Savings	⊙	⊙	⊙	○
Energy Cost Savings	●	⊗	⊙	●
Air Particulate Entrainment	●	⊗	⊙	⊙
Climate Impacts	●	⊗	⊙	⊙
Habitat Related Benefits	⊗	⊗	⊗	⊗
Air Quality Emission Reduction	●	⊗	⊙	●
GHG Emission Reduction	●	⊗	⊙	●

4.1.4 Nonstructural Strategies – Community Livability Benefits

The effectiveness of nonstructural strategies in enhancing various aspects of community livability are similar to those for economic and environmental outcomes. That is, some of these strategies influence the adoption and performance of structural systems and some aim to change behavior and municipal operations. Also, similar to the structural strategies for the same types of benefits, fewer of these benefits can be evaluated without some site specific information. For the most part though, the evaluation of potential benefits for green infrastructure has been applied to nonstructural systems that aim to increase the numbers and performance of these systems.

Strategies which seek to change behavior such as proper storage of pesticides or the use of rain barrels/water harvesting can have a positive impact, but the scale of that impact will be dependent upon factors such as the number of persons or households who change their behavior. This same uncertainty applies to strategies to reduce pollutants directly. While there is likely to be a net positive impact on society, these impacts on the broader quality of life are less clear. With respect to improved education and awareness, it is possible to quantify the numbers of people who attended a class or have been exposed to an advertising campaign, it is less clear how this information changes behavior or leads to increased number or maintenance of BMPs.

Table 17: Non Structural Strategies – Community Livability Benefits

Strategy	Increase # Of Structural Systems	Improve Structural Systems Performance	Initiatives to Change Behavior	Initiatives to Reduce Pollutants Directly
Heat Island Effect	⊙	⊙	⊙	O
Aesthetics	⊙	⊙	⊙	⊙
Recreational Benefits	⊙	⊙	⊙	⊙
Noise Reduction	⊗	⊗	⊗	⊗
Business Development & Jobs	⊙	⊙	⊙	⊙
Crime Reduction	⊗	⊗	⊗	O
Public Education/ Environmental Stewardship	⊗	⊗	⊗	⊗

4.2 Review of BMP Prioritization Frameworks

In consideration of the types of benefits that can and cannot be estimated with data for various types of BMP strategies, a number of options are available for summarizing the likely outcomes for decision making. As noted in the tables, some benefit categories are readily monetized under certain conditions and others require site specific information to perform computation. Many other benefits may arise from a specific BMP strategy but

cannot be explicitly quantified. Evaluations of any of these benefits for consideration in decision making also entails some significant uncertainties.

Accordingly, several approaches for summarizing benefits and impacts for decision making are available including: cost-effectiveness, benefit-cost analysis, multi-criteria analysis, and SROI. Each of these approaches has strengths and weaknesses for meeting the Division's objectives in developing a prioritization strategy. Overall though, each method can be implemented in a process that applies principles of economics, even in multi-objective decision analyses which do not require monetization, so that the categories of benefits are not overlapping or over-estimating value.

Cost-Effectiveness Analysis (CEA): This type of analysis focuses on identifying the best value for money in achieving a specific goal, such as storm water reduction. The process is not necessarily identifying the least costly strategy but the one that generates the greatest quantity of a goal per unit of cost (e.g. dollars per gallon of water detained). Costs in these analyses include the capital, maintenance and operations for implementing. This type of analysis is suitable for evaluating projects in which outcomes (benefits) can not be measured in dollar units but can be quantified. Cost-effectiveness analyses often apply a 'knee-of-the-curve' criterion to identify selecting the most cost-effective strategy because beyond this level of investment cost the effectiveness may increase but at a declining rate. These analyses have been used by communities across the country to identify opportunities for saving money while achieving storm water management goals.

Benefit-Cost Analysis (BCA): Since storm water BMPs can offer more benefits than conventional storm water management systems, cost-effectiveness analysis fails to offer decision makers adequate information for evaluating the alternatives (MacMullen, 2007). Benefit-cost analyses attempt to monetize as many benefits as possible to compare results with costs. This approach is a more direct way of accounting for multiple environmental, societal and economic benefits on a common basis and is not limited to a single goal as is often performed in a conventional cost-effectiveness framework. In some cases, direct environmental value cannot be computed directly, but observed from avoided damage costs or inferred from changes in property values. BCAs account for separate evaluation of benefit categories provided that they are not overlapping. In addition, BCA can be used to evaluate the benefits and costs to individual stakeholders, and comparison with strictly financial benefits with combined environmental and societal benefits – all in the same units of measure. The comparison of costs and benefits allows an explicit consideration of the trade-offs in project options. A BCA can determine whether the benefits of preservation (or restoration) are "worth" the costs and when the project is best implemented. In this sense, it ensures that the limited resources used to provide goods and services to society are used in the most efficient way—that is, to achieve the greatest net benefit (NRC, undated). The overall economic worth of an option can be summarized with a Net Present Value (NPV) or

Benefit/Cost Ratio (BCR).[17] BCA results do not incorporate perspectives on who gains or loses but whether the overall net benefits justify the investment. [18] Also, where impacts are perceived to be important but a lack of data is available to assign monetary values to it, additional consideration must be given beyond BCA metrics. For example, a trade-off analysis can be used to compare monetary net benefits with non-monetary impacts to determine a best overall value.

Economic Impact Analysis (EIA): The creation of jobs and business development is a direct and tangible measure of value to the community from expenditures to install storm water BMPs. As mentioned above, since these systems can be installed by low-skilled labor, implementation of these types of systems can provide opportunities for some of those who are most in need. Economic impact analyses trace the levels of expenditures on BMPs through the economy to reveal a total impact for the region. Also, green infrastructure tends to use more local labor and materials compared to grey infrastructure and as such would generate a larger local economic impact. The results can be determined in units of numbers of jobs created, increased income, value added, output, and tax revenue. To many stakeholders, these outcomes are more tangible because the results are shown in units that can be related to the unemployment rate and in gross regional product. For decision making purposes, economic impacts are directly proportional to the level of expenditure. As a result, larger projects would appear to provide greater value even if they are not the most cost-effective. These analyses also do not account for benefits that affect the local community and environment.

Multi-Objective Decision Analysis (MODA): For some project impacts, quantitative and monetary metrics are difficult to determine and the appropriateness of any related assumptions would be highly uncertain. MODA formalizes the process of including non-monetary characteristics of a project into decision making. Just like monetary measures, non-monetary measures try to account in a transparent way stakeholders' preferences for certain characteristics. These preferences are the basis for weights on criteria, which are used to compute an index for ranking projects. Non-monetized performance measures may be weighted with monetary values to produce a single performance metric, or reported alongside monetized values for assessing tradeoffs in decisions. These approaches can be as simple as establishing an equal weight and equal score to all benefit categories – whether they can be monetized or not – to sophisticated frameworks in which non-monetary and monetary benefits are scored and weighted in ways that can be consistent

[17] The NPV is the difference between the present value of benefits and the present value of costs. The present value of benefits is the discounted sum of all future benefits. The present value of costs is the discounted sum of all future costs. The BCR is a ratio of the present value of benefits to the present value of costs. It measures how much benefit would be obtained for each unit of cost invested in a project or policy.

[18] In theory, an initiative or project would be rated positively if the benefits to some are large enough to compensate the losses of others, assuming some mechanism existed.

with economic principles. The drawback is that weights are subjective and not based on economic theory or evidence.

Sustainable Return on Investment (SROI): SROI is a proven, economics-based method for appropriately estimating the monetary value of infrastructure. In such cases, the SROI process first identifies measurable performance indicators that can determine the impact of the infrastructure in specific categories of monetizable benefits. In the context of storm water, benefit categories can include those readily monetized as well as those with some quantitative indicators. In this way, SROI uses stakeholder input to estimate values for inclusion in monetary valuation. The SROI process has several notable features that separate it from more conventional evaluation methods. For instance, true to its economics roots, SROI ensures that key performance indicators do not measure overlapping outcomes which would 'double-count' benefits. In addition, the SROI process is marked by its transparency in accounting for uncertainty through Monte Carlo simulation. Uncertainty in the performance, cost and unit values of green infrastructure benefits would be modeled with probability distributions that account for the entire range of reasonable outcomes. Through Monte Carlo simulation, the full range of value for each strategy would be revealed and decisions can be made relative to the upside and downside risk. To be transparent, the probability distributions are established through facilitated discussions in a workshop setting.[19] The discussions are guided towards reaching consensus on how to best use available evidence, including the formation of quantitative descriptions of the uncertainty in the data.

Each of these approaches has strengths and weaknesses for the Division's purposes. For example, BCA is an established approach for evaluating the worthiness of an investment, such as green infrastructure. Benefits which cannot be monetized because they lack sufficient evidence would be treated in a qualitative assessment, but not included in a benefit-cost comparison. In such contexts a MODA approach can be taken to establish weights and scores for non-monetary outcomes and produce an index of value that can be compared with BCA results. Alternatively, an SROI approach can be undertaken that establishes monetary values for all key benefit categories through a collaborative review of evidence and then risk analysis methods are applied to quantify the uncertainty in quantitative and monetary parameters. MODA methods in establishing weights and scores can be used to support SROI results but ultimately with a SROI process, all key categories of benefits would be evaluated in monetary terms.

The next step for the Division is to develop a sound basis for using this information to prioritize BMPs across each watershed. Many challenges arise in prioritizing BMP strategies with the types of varying benefits presented in Chapter 4. Ideally, a prioritizing approach would be objective, based on site-specific and peer-reviewed evidence,

[19] An initial workshop was held in May in San Diego to discuss benefit categories, strategies and decision making frameworks. Comments received from this workshop are included in Appendix 3.

account for life cycle outcomes and reflect various sources of uncertainty. Several prioritization options exist that address some of these goals for the framework.

5 Summary of Key Findings

Our findings in this report indicate that many types of benefits can accrue to local residents, businesses, and the general public. Computing benefits of BMPs has been standardized to some extent in the Center for Neighborhood Technology (CNT) report which outlines the data and calculations for a number of benefits (CNT, 2010). For the Division, a similar calculation process could be implemented and it would be consistent with efforts implemented in other cities. However, a significant level of uncertainty would arise in preparing such estimates without specific data on BMP designs and activities for each strategy as well as site specific information about where they would be implemented.

The next best evaluation strategy for the Division at present would entail a simplified assessment of the likely *existence* of quantifiable benefits for each strategy. In this report, we have evaluated the degree to which benefits can be quantified and potentially monetized for each type of strategy. Drawing from the previous tables in Chapter 4, the results of this assessment are shown in Table 18. A “Yes” in one of the table cells indicates that there would be sufficient evidence to quantifiably determine the value of a strategy, provided that information about the strategy and implementation location is better understood. In this high-level summary, it may be assumed that if a quantifiable benefit exists, they would be large enough to generate observable public value and influence decisions accordingly.

These initial findings however must be developed in more detail to provide practical use in prioritizing strategies for the Division. In particular, the feasibility of estimating benefits must assessed for each individually identified strategy (see Appendix 2), not its strategy group as shown in Table 18. With this information, the Division can establish an initial indication of specific strategies that provide the best value. This effort is planned for phase two of this project.

Table 18: Summary of Evidence for Estimating Benefits for Structural and Nonstructural Strategies

	Structural			Nonstructural			
Strategy	Green Infrastructure	Multiuse Treatment Areas	Water Quality Improvement	Increase # Of Structural Systems	Improve Structural Systems Performance	Initiatives To Change Behavior	Initiatives To Reduce Pollutants Directly
Flood Risk Reduction	YES	YES	YES	YES	YES	YES	
Irrigation Cost Savings	YES			YES	YES	YES	
Energy Cost Savings	YES			YES		YES	YES
Air Particulate Entrainment	YES			YES		YES	YES
Climate Impacts	YES			YES		YES	YES
Habitat Related Benefits							
Air Quality Emission Reduction	YES			YES		YES	YES
GHG Emission Reduction	YES			YES		YES	YES
Heat Island Effect	YES	YES		YES	YES	YES	
Aesthetics	YES	YES		YES	YES	YES	YES
Recreational Benefits	YES	YES		YES	YES	YES	YES
Noise Reduction							

Strategy	Structural			Nonstructural			
	Green Infrastructure	Multiuse Treatment Areas	Water Quality Improvement	Increase # Of Structural Systems	Improve Structural Systems Performance	Initiatives To Change Behavior	Initiatives To Reduce Pollutants Directly
Business Development & Jobs	YES			YES	YES	YES	YES
Crime Reduction							
Public Education/ Environmental Stewardship							

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Appendix 1: Benefit Calculations

This appendix discusses the quantitative calculations and data involved in estimating benefits for those categories which can be converted to monetary values, given site specific data. Benefit categories that can be readily quantified and monetized are discussed here. Benefit categories that are not included here are: Habitat Creation Benefits, Heat Island Effects, and Environmental Awareness / Stewardship.

Flood Risk Reduction Benefits

By reducing the volume of storm water runoff, the proposed strategies can reduce the frequency and severity of flooding. The impact of green infrastructure on flooding is highly site and watershed specific, and thus this guide does not provide general instructions for quantifying the reduction in flood risk resulting from a green infrastructure program. There are several methods[20] for valuing the impact of flood control:

- Hedonic pricing to examine how flood risk is priced into real estate markets;
- Insurance premiums paid for flood damage insurance as a proxy for the value of reducing the risk of flood damage;
- Avoided damage cost approach; and
- Contingent valuation methods

The diagram presents a high level overview of how the benefits could be monetized. The 'Increase in Flood Control' could be monetized using any of the methods suggested above. Some methods have more robust information than others. CNT recommends using a range of 2–5 percent property value increase for removal from the floodplain (CNT, 2010).

Figure 3: Flood Control Benefits

[20] Downstream Economic Benefits From Storm-Water Management. Journal of Water Resources Planning and Management. Braden, J.B. and D.M. Johnston. November/December, 2004

Irrigation Cost Savings

The method for determining the irrigation cost savings begins with quantifying the reduction in water demand from utilities based on the amount that is harvested on site.

This amount can be calculated by using the various water retention factors for the various green infrastructure and multiplying by the annual precipitation.

A diagram is provided here that determines benefits of retention based on cost avoidance. This information would be used in calculating the Decrease in Potable Water. The cost of the water would be derived from local utilities.

Figure 4: Irrigation Cost Savings

Table 19: Green Infrastructure Retention Parameters

	Amount Retained	Unit	Scale
Water Harvesting	0.62	Gallons of runoff	Per inch of Rain

Source: CNT, 2010, McPherson, E. et al. 2006

Energy Cost Savings

The most important step in this calculation will be the reduced energy needs which will depend on the number of buildings which will benefit from the temperature control provided by green infrastructure and LID and the scale of LID/GI implementation. The data on the physical characteristics of GI to insulate or reduce energy use are provided as well.

Figure 5: Energy Cost Savings

The first step to valuing the benefits of reduced energy use is determining the amount of energy saved by BMP. The benefit of energy savings can be terms of kilowatt hours (kWh) of electricity and British thermal units (Btu) of natural gas reduced.

As noted, the total reduction is very specific to the type of improvement/change. The actual benefits realized in terms of energy savings due to the implementation of a green roof will be significantly impacted by the following variables:

- Growing media composition, depth and moisture content
- Plant coverage and type
- Building characteristics, energy loads and use schedules
- Local climate variables and rainfall distribution patterns

These characteristics will influence the R values for conventional and green roofs in region (which will be used to calculate the annual energy savings from reduced energy needs). Other data needs are:

- Annual number of cooling degree days (°F days) in your region
- Annual number of heating degree days (°F days) in your region

Having calculated the direct kWh and BTU saved in reduced building energy use, it is possible to assign a dollar value to these savings.

One may calculate the direct cost savings by multiplying the kilowatt hours or BTUs of electricity and natural gas, respectively, by local utility rates

Air Pollution Emission Reduction

Practices that indirectly lower emissions of air pollution include any practices that reduce energy consumption through decreased energy use in neighboring buildings or through reduced water treatment needs.

The kilowatt hours (or million BTUs) of reduced energy from the energy cost savings will be used in calculating the air pollution emission reduction benefit. The total amount of energy saved will be converted to the pounds of criteria pollutants reduced. The values, in dollars per pound, of the pollutants will come from existing guidance from the EPA and other sources that value these pollutants.

The EPA provides estimates for annual output emissions rates of national electricity production and natural gas:

Figure 6: Air Pollution Emission Reduction

Table 20: Sample Criteria Pollutant Emission Factors

Pollutant	lbs/kWh	lbs/Million Btu
NO2	0.001937	0.721
SO2	0.005259	0.266

Table 21: Costs of Pollutants

Pollutant	Value per lb
NO2	$3.34
O3	$3.34
SO2	$2.06
PM-10	$2.84

Source: CNT (2010), McPherson et al. (2006), Wang and Santini (1995)

Greenhouse Gas Emission Reduction

This benefit calculation follows the same methodology as the air pollution emission reduction benefit, only different conversion factors for CO2 will be used, and different monetary values.

The amount of CO2 emissions from power plants varies depending on the electricity source (e.g. coal, nuclear, wind, etc), so the EPA eGRID program should be consulted.

The CAMX subregion for 2010 has 932.82 lb per M Wh[21].

The current recommended price of CO2 is $40 per metric ton[22].

Figure 7: Greenhouse Gas Emission Reduction

[21] http://www.epa.gov/cleanenergy/energy-resources/egrid/

[22] Technical Support Document: Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866 (May 2013; revised November 2013), page 18

Air Particle Entrainment

This section quantifies the direct uptake and deposition of air pollutants by green infrastructure and provides a framework for establishing value these impacts in monetary terms. The criteria pollutants addressed here are nitrogen dioxide (NO_2), ozone (O_3), sulfur dioxide (SO_2) and particulate matter of aerodynamic diameter of ten micrometers or fewer (PM-10).

Figure 8: Air Particle Entrainment

Practices that provide a direct benefit of uptake and deposition include green roofs, trees and bio-infiltration. Similar to the methodology for emission cost savings from reduced energy use, the air particle entrainment benefits will quantify the amount (in pounds) of criteria pollutants removed from the environment. The total amount will depend on the scale of LID/GI and the type of GI. Table 22 provides values compiled by CNT (2010) per square foot of green roof installed. It should be noted that local values should be used if available (CNT, 2010). Factors such as local climates will influence plants ability to grow, and climates with longer growing seasons will see greater air quality improvements than those with shorter ones. Additionally, trees provide benefits in a similar manner. The Forest Service *Tree Guides* provides information for trees for particular climate regions (Table 23).

Table 22: Pollutant Removal Factors for Green Roofs

	Low (lbs/SF)	High (lbs/SF)
NO2	3.00×10^{-4}	4.77×10^{-4}
O3	5.88×10^{-4}	9.20×10^{-4}
SO2	2.29×10^{-4}	4.06×10^{-4}
PM-10	1.14x10-4	1.33x10-4

Table 23: Annual Criteria Pollutant Reductions, 40 year Average

	Small tree: Crabapple (22 ft tall, 21 ft spread)	Medium tree: Red Oak (40 ft tall, 27 ft spread)	Large tree: Hackberry (47 ft tall, 37 ft spread)
NO2	0.39 lbs	0.63 lbs	1.11 lbs
SO2	0.23 lbs	0.42 lbs	0.69 lbs
O3	0.15 lbs	0.2 lbs	0.28 lbs
PM-10	0.17 lbs	0.26 lbs	0.35 lbs

Carbon Sequestration

Similar to the air particle entrainment methodology, LID/GI can provide carbon sequestration benefits. The pounds of carbon sequestered per unit area depend on several local factors, including the specific practice, the types of species planted and the local climate.

For green roofs, the recommended range of grams of carbon sequestered per square meter from aboveground biomass, as determined by research synthesized in a Michigan State University report offers average carbon sequestration values provided by extensive green roofs' aboveground biomass (Getter et al. 2009).

Figure 9: Carbon Sequestration

Table 24: Green Roof Carbon Sequestration Rates

	Low (lbs/SF)	High (lbs/SF)
CO2	0.0332	0.0344

Table 25: Sample Carbon Sequestration Rates for Different Trees

Net CO2 (lbs)	Residential Yard Opposite West-Facing Wall	Residential Yard Opposite South-Facing Wall	Residential Yard Opposite East-Facing Wall	Public Tree on a Street or in a Park
Small tree: Crabapple (22 ft tall, 21 ft spread)	390	226	335	336
Medium tree: Red Oak (40 ft tall, 27 ft spread)	594	212	487	444
Large tree: Hackberry (47 ft tall, 37 ft spread)	911	665	806	735

Aesthetic Improvements

The current method to calculate the benefit of aesthetics is to look at the changes in property values due to LID/GI. While the research on this subject supports the belief that there is a positive (increase) in property value due to LID/GI, there is much uncertainty regarding the size and scale of that. The methodology for calculating this benefit is to apply a premium on property that will capitalize on the aesthetic benefits of LID/GI.

Street trees and urban vegetation have been estimated by realtors to add $15,000 to $25,000 in value to a property compared to similar areas with o trees. The NRDC notes that buildings with green roofs can rent at a 16% premium.[23] Additionally, the NRDC reports that Tyrväinen and Miettinen (2000) found that units in multifamily buildings with views of trees or forest cover can increase rents by as much as 4.9 percent (Wolf 2007)[24].

Figure 10: Aesthetic Improvements

Table 26: Premiums on Property Value due to Aesthetics

Action	Monetized Benefit	Location	Source
LID and proximity to trees and other vegetation	0 to 7% Increase in Property Value	Philadelphia, PA	Stratus 2009
LID of adjacent properties	3.5 to 5% Increase in Property Value	King County, WA	Ward et al. 2008

[23] Natural Resources Defense Council 2013

[24] Ibid

Recreation Benefits

The methodology for calculating this benefit will involve determining the total number of recreational users of the new LID/GI facilities and applying a monetary value per user to get total benefits.

Figure 11: Recreation Benefits

The total number of users will be based on local information. The monetized value of recreational benefits comes from different research fields. Some research from the transportation literature suggests benefits can be determined on an individual user basis. A wide variety of studies of outdoor recreational activities (non-bicycling) generated typical values of about $40 per day (in 2004 dollars).[25]

The value of time is estimated based on US DOT guidance for TIGER VI. The value of time for personal travel is $12.98 per hour. The benefit per trip for the appropriate facility is multiplied by the number of daily existing and induced commuters, and then doubled to include trips both to and from work. This results in a daily mobility benefit.

A premium on the value of a trip is developed from the January 2010 UK's Department of Transport *Guidance on the Appraisal of Walking and Cycling Schemes*. This Guidance reports a premium value of an off-road bicycle track versus an on-road facility. Hopkinson & Wardman (1996) developed estimates of on-road segregated cycle lane assuming benefits of £0.02 per minute. This benefit is assigned to existing recreational cyclists that would enjoy the new bike facility's quality, comfort and convenience.

Crime Reduction Benefits

Residents living in "greener" surroundings report lower levels of fear, fewer incivilities, and less aggressive and violent behavior. While there is not literature with respect to

[25] San Francisco County Transportation Authority Department of Parking and Traffic. *Maintain Bicycle Facilities (spreadsheet)*. 2004 2/28/2004, as cited in *Guidelines for Analyzing the Benefits and Costs of Bicycle Facilities*, Krizek et al., 2005.

monetizing this benefit, there is research that looks at quantifying the benefit of crime reduction do to a greener environment. This study was performed in a public housing complex in an urban environment, so the actual percentage reduction may not be the same in other areas.

However, that does not mean there is no impact on crime. A possible methodology is to look at current crime levels in areas where proposed LID/GI will occur, and apply a reduction, but smaller in size than those listed below.

	Areas with Medium Level of Vegetation	Areas with High Levels of Vegetation
Total Crimes	42%	52%
Property Crimes	40%	48%
Violent Crimes	44%	56%

Source: Environment and Crime in the Inner City: Does Vegetation Reduce Crime? Kuo & Sullivan. Environment and Behavior, Volume 33 No.3, May, 2001

Business Development Benefits

In areas where green streets lead to an enhanced the sense of place, and increase in foot and bicycle traffic can support retail development. Case studies by the New York City DOT examined before and after changes in Retail Sales Tax Filings, Commercial Leases & Rents, and City−Assessed Market Value. The study's methodology does not ultimately prove causality between the street improvement projects and any resulting economic changes; however, some locations of green street development saw a significant increase in retail sales compared to the changes in retail sales for the borough as a whole.

Researchers do believe that any benefits from the green streets will be fully realized 2 years after development, and so applying this growth to retail sales further in the future is not applicable.

We can apply these percentages to current retail sales of businesses located along areas that will be developed into green streets to see the potential impact on businesses.

Table 27: Increase in Retail Sales after Street Development

Area	Change in Sales Year 1	Change in Sales Year 2
Vanderbilt Ave	39%	59%
Borough	27%	19%
Area	**Change in Sales Year 1**	**Change in Sales Year 2**
St. Nicholas Avenue/Amsterdam	18%	48%
Borough	17%	39%

Job Creation Benefits

Determining the number of jobs created, and the economic impact of those jobs, is simply a function of the total amount spent on the program. In general, the larger the area (or economic base) the larger the impact. Direct, indirect and induced economic impacts from spending on the strategies can be calculated using Economic Impact Analysis models.

The creation of jobs, and such, salaries for the workers to spend, would also have tax impacts at the State, Local, and Federal government level.

Current guidance on a methodology from the Council of Economic Advisors' [26] methodology as assumes that for every **$76,923** of additional government spending, one job-year is created. A job-year means one job for one year. To estimate the employment impacts in terms of job-years one simply adds up the number of jobs created every year over the analysis period.

The number of jobs created is a division of the total spending by the CEA recommended value.

[26] Executive Office of the President, Council of Economic Advisers, "Estimates of Job Creation from the American Recovery and Reinvestment Act of 2009," Washington, D.C., May 11, 2009; and September 2011 Update.

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Appendix 2: Comprehensive List of Nonstructural Strategies

This list of strategies has been compiled from a review of each WAMP, CLRP and WQIP document

ID	NONSTRUCTURAL STRATEGY (Official Description)	Short Description	Category
Jurisdictional Runoff Management Program (JRMP) Strategies			
Development Planning			
All Development Projects			
1	For all development projects, administer a program to ensure implementation of source control BMPs to minimize pollutant generation at each project and implement low-impact development (LID) BMPs to maintain or restore hydrology of the area, where applicable and feasible.	For all development projects, ensure source control BMPs	Increasing # of BMPs or LIDs
2	Amend municipal code and ordinances, including zoning ordinances, to facilitate and encourage LID opportunities.	Amend municipal code to encourage LID	Increasing # of BMPs or LIDs
3	Train staff on LID regulatory changes and LID Design Manual.	Train staff on LID regulatory changes and LID Design Manual.	Increasing # of BMPs or LIDs
Priority Development Projects (PDPs)			
4	For PDPs, administer a program requiring implementation of on-site structural BMPs or LIDs to control pollutants and manage hydromodification. Includes confirmation of design, construction, and maintenance of PDP structural BMPs or LIDs.	For PDPs, require implementation of on-site structural BMPs or LIDs	Increasing # of BMPs or LIDs
5	Update BMP Design Manual procedures to determine nature and extent of storm water requirements applicable to development projects and to identify conditions of concern for selecting, designing, and maintaining appropriate structural BMPs or LIDs.	Update BMP Design Manual procedures	Improve / Maintain BMPs or LIDs
	1. Amend BMP Design Manual for trash areas. Require full four-sided enclosure, siting away from storm drains and cover. Consider the retrofit requirement.		Improve / Maintain BMPs or LIDs
	2. Amend BMP Design Manual for animal-related facilities.		Improve / Maintain BMPs or LIDs
	3. Amend BMP Design Manual for nurseries and garden centers.		Improve / Maintain BMPs or LIDs
	4. Amend BMP Design Manual for auto-related uses.		Improve / Maintain BMPs or LIDs

ID	NONSTRUCTURAL STRATEGY (Official Description)	Short Description	Category
6	Administer an alternative compliance program to on-site structural BMP implementation (includes identifying Watershed Management Area Analysis [WMAA] candidate projects).	Administer an alternative compliance program	Improve / Maintain BMPs or LIDs
	1. Develop a mitigation policy for public and private development projects that links development with mitigation within the same watershed.		Improve / Maintain BMPs or LIDs
	1a. Create an In-Lieu Fee		Improve / Maintain BMPs or LIDs
Construction Management			
7	Administer a program to oversee implementation of BMPs during the construction phase of land development. Includes inspections at an appropriate frequency and enforcement of requirements.	Oversee implementation of BMPs during the construction	Improve / Maintain BMPs or LIDs
Existing Development			
Commercial, Industrial, Municipal, and Residential Facilities and Areas			
8	Administer a program to require implementation of minimum BMPs for existing development (commercial, industrial, municipal, and residential) that are specific to the facility, area types, and PGAs, as appropriate. Includes inspecting existing development at appropriate frequencies and using appropriate methods. (Inspections for PGAs of concern: Vehicle Washing area inspections and inspections for food-related businesses, animal-related businesses, nurseries and garden centers, and auto-related businesses.)	Require implementation of minimum BMPs for existing development	Improve / Maintain BMPs or LIDs
	1. Update minimum BMPs for existing residential, commercial, and industrial development and enforce them.		Improve / Maintain BMPs or LIDs
	2. Design, implement, and enforce property- and PGA-based inspections.		Improve / Maintain BMPs or LIDs
	1. Review policies and procedures to ensure discharges from swimming pools meet permit requirements.		Improve / Maintain BMPs or LIDs
	3. Develop a self-reporting inspection option for select industrial and commercial facilities.		Improve / Maintain BMPs or LIDs
9	Implement pet waste program. May include installation and maintenance of pet waste bag dispensers and trash bins, signage and education, physical removal of pet waste, or enforcement.	Implement pet waste program	Changing Behavior to reduce pollutants at the source
10	Promote and encourage implementing designated BMPs at residential areas.	Promote and encourage implementing designated BMPs at residential areas.	Increasing # of BMPs or LIDs

ID	NONSTRUCTURAL STRATEGY (Official Description)	Short Description	Category
	1. Expand residential BMP (irrigation, rainwater harvesting, and turf conversion) rebate programs to multi-family housing in target areas.		Increasing # of BMPs or LIDs
	2. Residential BMP: Rain Barrel		Increasing # of BMPs or LIDs
	3. Residential BMP: Irrigation Control (Turf Conversion)		Increasing # of BMPs or LIDs
	4. Residential BMP: Downspout Disconnect		Increasing # of BMPs or LIDs
	5. Provide financial incentives to property owners to convert landscaping to site-specific native plants.		Increasing # of BMPs or LIDs
11	Develop pilot project to identify and carry out site disconnections in targeted areas.	Develop pilot project to identify and carry out site disconnections in targeted areas.	Increasing # of BMPs or LIDs
12	Identify and reduce incidents of power washing discharges from nonresidential sites.	Identify and reduce incidents of power washing discharges from nonresidential sites.	Changing Behavior to reduce pollutants at the source
13	Promote and encourage implementation of designated BMPs in nonresidential areas.	Promote and encourage implementation of designated BMPs in nonresidential areas.	Increasing # of BMPs or LIDs
14	Proactively monitor for erosion, and complete minor repair and slope stabilization on municipal property.	Monitor for erosion, and slope stabilization on municipal property.	Increasing # of BMPs or LIDs
	MS4 Infrastructure		
15	Implement operation and maintenance activities (inspection and cleaning) for MS4 and related structures (catch basins, storm drain inlets, detention basins, etc.).	Implement operation and maintenance activities	Removing pollutants or sources directly
	1. Optimize catch basin cleaning to maximize pollutant removal.		Removing pollutants or sources directly
	2. Proactively repair and replace MS4 components to provide source control from MS4 infrastructure.		Removing pollutants or sources directly
	3. Increase frequency of open-channel cleaning and scour pond repair to reduce pollutant loads.		Removing pollutants or sources directly

ID	NONSTRUCTURAL STRATEGY (Official Description)	Short Description	Category
16	Implement controls to prevent infiltration of sewage into the MS4 from leaking sanitary sewers.	Implement controls to prevent infiltration of sewage into the MS4	Removing pollutants or sources directly
	1. Identify sewer leaks and areas for sewer pipe replacement prioritization.		Removing pollutants or sources directly
Roads, Streets, and Parking Lots			
17	Implement operation and maintenance activities for public streets, unpaved roads, paved roads, and paved highways.	Implement operation and maintenance activities for public streets	Removing pollutants or sources directly
	1. Enhance street sweeping through equipment replacement and route optimization.		Removing pollutants or sources directly
	2. Initiate sweeping of medians on high-volume arterial roadways.		Removing pollutants or sources directly
	3. Increase maintenance on access roads and trails.		Removing pollutants or sources directly
18	Require sweeping and maintenance of private roads and parking lots in targeted areas.	Require sweeping and maintenance of private roads and parking lots in targeted areas.	Removing pollutants or sources directly
19	Identify sites for pilot study to test Permeable Friction Course (PFC), which is a porous asphalt that overlays impermeable asphalt.	Identify sites for pilot study to test Permeable Friction Course (PFC)	Increasing # of BMPs or LIDs
Pesticide, Herbicides, and Fertilizer Program			
20	Require implementation of BMPs to address application, storage, and disposal of pesticides, herbicides, and fertilizers on commercial, industrial, and municipal properties. Includes education, permits, and certifications.	Require BMPs to address pesticides, herbicides, and fertilizers issues	Changing Behavior to reduce pollutants at the source
Retrofit and Rehabilitation in Areas of Existing Development			
21	Develop and implement a strategy to identify candidate areas of existing development appropriate for retrofitting projects and facilitate the implementation of such projects.	Identify candidate areas for retrofitting projects	Increasing # of BMPs or LIDs

ID	NONSTRUCTURAL STRATEGY (Official Description)	Short Description	Category
22	Develop and implement a strategy to identify candidate areas of existing development for stream, channel, or habitat rehabilitation projects and facilitate implementation of such projects.	Identify areas for stream, channel, or habitat rehabilitation projects	Increasing # of BMPs or LIDs
IDDE Program			
23	Implement Illicit Discharge, Detection, and Elimination (IDDE) Program per the JRMPs. Requirements include maintaining an MS4 map, using municipal personnel and contractors to identify and report illicit discharges, maintaining a hotline for publicly reporting illicit discharges, monitoring MS4 outfalls, and investigating and addressing any illicit discharges.	Implement Illicit Discharge, Detection, and Elimination (IDDE) Program	Changing Behavior to reduce pollutants at the source
Public Education and Participation			
24	Implement a public education and participation program to promote and encourage development of programs, management practices, and behaviors that reduce pollutant discharge in storm water prioritized by high-risk behaviors, pollutants of concern, and target audiences.	Implement a public education and participation program	Changing Behavior to reduce pollutants at the source
	1. Expand outreach to homeowners' association (HOA) common lands and HOA rebates.		Changing Behavior to reduce pollutants at the source
	2. Develop an outreach and training program for property managers responsible for HOAs and maintenance districts.		Changing Behavior to reduce pollutants at the source
	3. Conduct trash cleanups through community-based organizations involving target audiences.		Changing Behavior to reduce pollutants at the source
	4. Target human behavior in parks and other public areas including trash reduction or other high-impact behavior to habitat, wildlife, and water quality.		Changing Behavior to reduce pollutants at the source
	5. Improve consistency and content of websites to highlight enforceable conditions and reporting methods.		Changing Behavior to reduce pollutants at the source

ID	NONSTRUCTURAL STRATEGY (Official Description)	Short Description	Category
	6. Contribute to San Diego County-led effort through regional education group for outreach, education, and policy measures for the equestrian community and property owners.		Changing Behavior to reduce pollutants at the source
	1. Develop a targeted education and outreach program for homeowners adjacent to or with tributaries or streams within their property.		Changing Behavior to reduce pollutants at the source
	1. Develop a targeted education and outreach program for homeowners with orchards or other agricultural land uses on their property.		Changing Behavior to reduce pollutants at the source
	2. Enhance school and recreation-based education and outreach		Changing Behavior to reduce pollutants at the source
	3. Develop education and outreach to reduce over-irrigation		Changing Behavior to reduce pollutants at the source
	7. Develop regional training for water-using mobile businesses.		Changing Behavior to reduce pollutants at the source
25	Enhance education and outreach based on results of effectiveness survey and changing regulatory requirements.	Enhance education and outreach	Changing Behavior to reduce pollutants at the source
26	Provide technical education and outreach to the development community on the design and implementation requirements of the MS4 Permit and Water Quality Improvement Plan requirements.	Technical education and outreach on the MS4 Permit and WQIP	Changing Behavior to reduce pollutants at the source
Enforcement Response Plan			
27	Implement escalating enforcement responses to compel compliance with statutes, ordinances, permits, contracts, orders, and other requirements for IDDE, development planning, construction management, and existing development in the Enforcement Response Plan.	Implement escalating enforcement responses to compel compliance	Changing Behavior to reduce pollutants at the source

ID	NONSTRUCTURAL STRATEGY (Official Description)	Short Description	Category
	1. Increase enforcement of over-irrigation.		Changing Behavior to reduce pollutants at the source
	2. Focus locally on enforcement of water-using mobile businesses.		Changing Behavior to reduce pollutants at the source
28	Increase identification and enforcement of actionable erosion and slope stabilization issues on private property and require stabilization and repair.	Enforcement of actionable erosion and slope stabilization issues	Increasing # of BMPs or LIDs
	Optional Strategies		
29	Continue participating in source reduction initiatives. (Varies. For example, the Brake Pad Partnership is existing. Considered may be a plastic bag ban, banning leaf blowers, banning pesticides or herbicide.)	Continue participating in source reduction initiatives.	Changing Behavior to reduce pollutants at the source
30	Develop a program to address and capture trash and debris.	Develop a program to address and capture trash and debris.	Removing pollutants or sources directly
31	Support partnership efforts by social service providers to provide sanitation and trash management for persons experiencing homelessness.	Sanitation and trash management for persons experiencing homelessness.	Removing pollutants or sources directly
32	Protect areas that are functioning naturally.	Protect areas that are functioning naturally.	Removing pollutants or sources directly
	1. Develop a policy to avoid additional hardscape development and degradation in unpaved open space areas.		Removing pollutants or sources directly
	2. Add permanent open space protections to undeveloped city-owned land.		Removing pollutants or sources directly
	3. Acquire privately owned undeveloped parcels of land.		Removing pollutants or sources directly
	Mapping and risk assessment of agricultural operations.		Removing pollutants or sources directly

ID	NONSTRUCTURAL STRATEGY (Official Description)	Short Description	Category
	Implement a program to target on-site wastewater treatment (septic) systems. May include mapping and risk assessment, inspection, or maintenance practices.		Removing pollutants or sources directly
	Removal of invasive plants and animals.		Removing pollutants or sources directly
33	Conduct a feasibility study to determine if implementing an urban tree canopy (UTC) program would benefit water quality and other goals.	Conduct a feasibility study on urban tree canopy (UTC) program	Increasing # of BMPs or LIDs
	Investigate alternative pollutant removal or treatment strategies such as fungus used to remove soil contaminants.		Removing pollutants or sources directly
34	Conduct special studies to gather additional monitoring information about priority conditions or beneficial uses. (Monitoring may include investigative measures such as genetic tracking for bacteria sources or geomorphic studies for sediment sources or processes. - LOS PEN)	Gather monitoring information about priority conditions or beneficial uses	Improve / Maintain BMPs or LIDs
35	Collaborate with entities potentially including, but not limited to:	Collaborate with entities potentially including, but not limited to:	Improve / Maintain BMPs or LIDs
	• Departments within the same Responsible Agency.		Improve / Maintain BMPs or LIDs
	• Other governmental agencies such as water, transportation, or public health agencies.		Improve / Maintain BMPs or LIDs
	• Nongovernmental agencies such as environmental and community groups and private corporations.		Improve / Maintain BMPs or LIDs
	• Dischargers regulated under other permits including the Phase II National Pollutant Discharge Elimination System (NPDES) Permit, Industrial General Permit, and Construction General Permit.		Improve / Maintain BMPs or LIDs
	Collaboration may take the form of joint participation in stakeholder meetings, studies or development studies or BMPs, hiring of a Watershed Coordinator to facilitate communication between community groups and the City, formation of a City Watershed team to protect and restore the watershed, or participating in existing groups, such as Integrated Regional Water Management (IRWM) groups.		Improve / Maintain BMPs or LIDs
	1. Funding for collaborative strategies may include providing in-kind services, shared costs through agreements, and preparation and competition for grant funding.		Improve / Maintain BMPs or LIDs

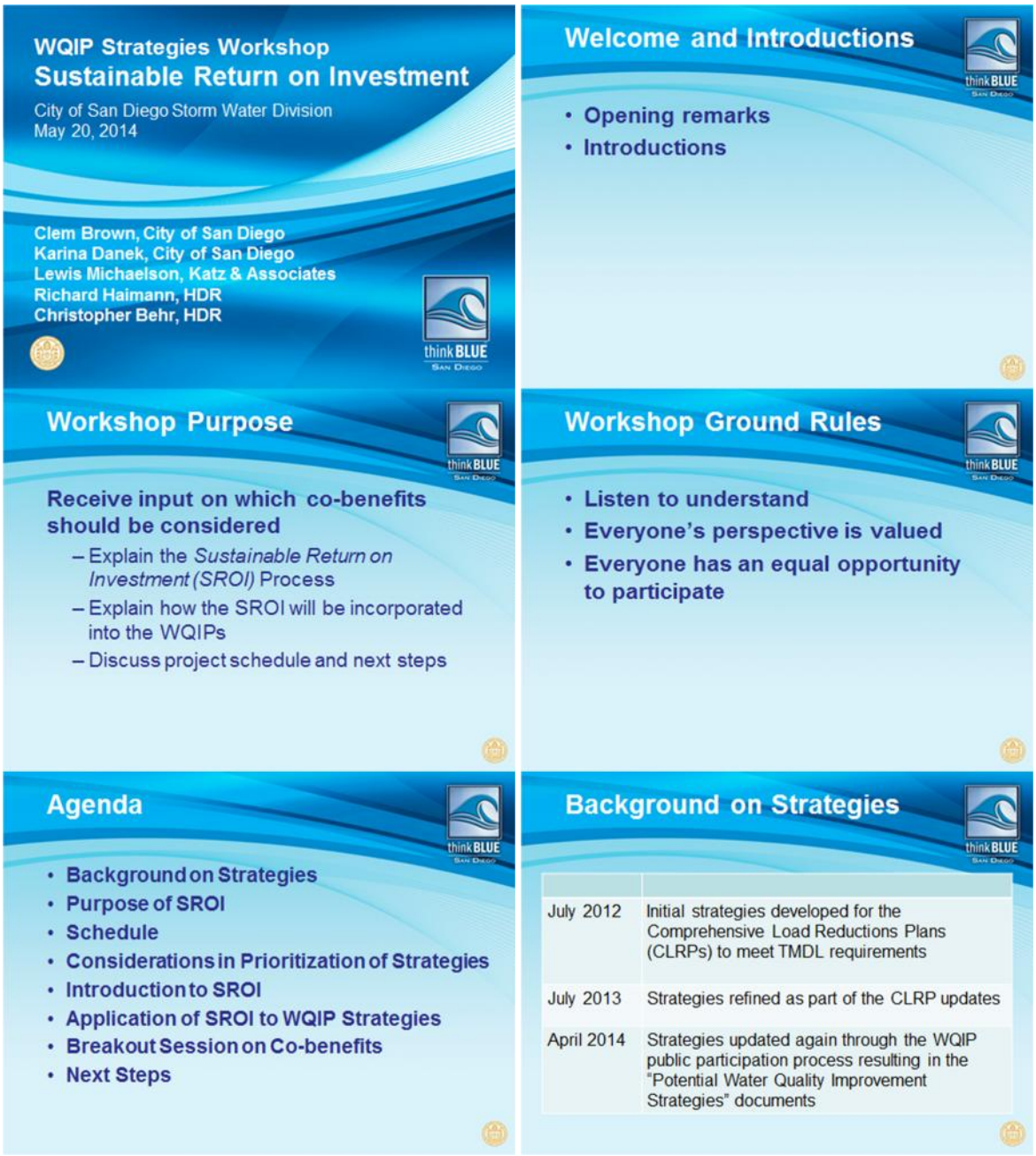
ID	NONSTRUCTURAL STRATEGY (Official Description)	Short Description	Category
Added			
	Vehicle Washing areas supplemental standards		Improve / Maintain BMPs or LIDs
	Keeping of large animals		Improve / Maintain BMPs or LIDs
	Xeriscaping, turf conversion and other irrigation, pesticide and fertilizer reduction (Caltrans specific. CLRP P. E-19)		Changing Behavior to reduce pollutants at the source
	Garden and landscape practices (primarily for Contractors. Otherwise covered in W.)		Changing Behavior to reduce pollutants at the source
	Increase street sweeping frequency (otherwise covered in P.)		Improve / Maintain BMPs or LIDs
	Rebates/Incentives to residential and non-residential. (Otherwise covered in J.)		Improve / Maintain BMPs or LIDs

Notes: Purple highlighting where there was a modification between the "Potential Strategies" documents.

Appendix 3: Workshop Summary

This section includes the presentation provided to the stakeholders, which guided discussion on benefits. Stakeholder comments were written down post workshop and sent back to the Division for consideration. These comments are included below.

Workshop Presentation

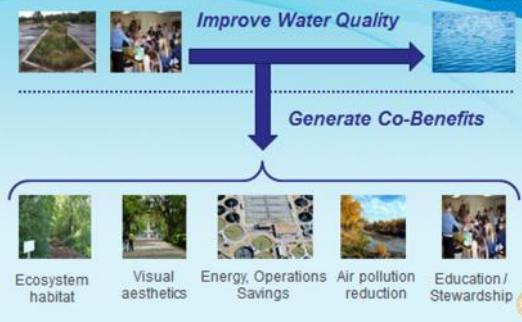


Schedule

May 20, 2014	Co-benefit Workshop
May 27, 2014	Comments on Co-benefits Due
June - August 2014	Preliminary SROI Analysis
Late August, 2014 (tentative)	SROI Workshop Review
September, 2014	Finalize Analysis
Late September 2014	Potential Changes to WQIP Strategies (non-structural)

Choices

Co-benefits



How to choose

- Desirable Elements of Decisions
  - Quantitative measures
  - Transparent assessment
  - Objective evidence
  - Account for uncertainty
  - Provide best value

Ultimately… need to know:
What is the best value?
How do you know?

Introduction to Sustainable Return on Investment (SROI) Process

- Best practices:
  - Objective, theory-based
  - Peer-reviewed evidence
  - Life cycle monetary outcomes
  - Accounts for uncertainty
  - Avoids double-counting
- Key Features:
  - Comprehensive
  - Transparent analysis
  - Impact distribution
  - Adaptable to local conditions
  - Decision metrics that matter

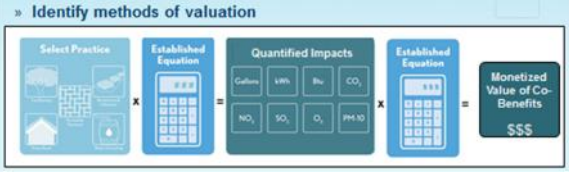
SROI: A Four Step Process

- Step 1: Determine Co-Benefits
  - Determine key performance metrics
- Step 2: Preliminary Analysis
  - Research and analyze potential project performance
- Step 3: Stakeholder Workshop
  - Review methods, metrics and risks
- Step 4: Quantitative Analysis
  - Generate results for decision making

Application of SROI to Prioritizing Potential Strategies

- Identify types of co-benefits (examples)

- Identify methods of valuation



Alignment of Strategies to Co-Benefits

Structural Strategy (Examples)	Economic		Environmental				Societal (Quality of Life)				
	On-site Energy Savings	Operational Cost Savings	Carbon Sequestration	Carbon Emissions Reduction	Visual Aesthetics	Ecosystem / Habitat	Air Quality	Urban Heat (esp. with trees)	Property Value	Recreation (access dependent)	Jobs
Green roof	○	⊗	⊗	⊗		×	⊗		×		⊗
ROW bio-swales (with trees)		⊗	⊗	⊗		×	⊗	○	⊗		⊗
Large Bio-retention Facilities		⊗	⊗	⊗	○	×	⊗		○	⊗	⊗
Porous pavement		⊗		⊗			⊗		○		⊗

⊗ Measurable and Monetizable Benefit
× Measurable Benefit
○ Perceived Benefit

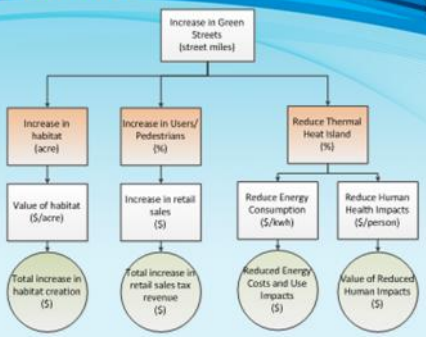
Potential Structural Strategies

- **Green Infrastructure**
  - Green streets, permeable pavement etc.
- **Multiuse Treatment Areas**
  - Infiltration and detention basins, stream rehabilitation, etc.
- **Water Quality Improvement**
  - Trash segregation, Proprietary BMPs, etc.


Co-Benefits of Green Streets

- **Unit of Measure**
  - Street miles of improvements
- **Drivers of Impact**
  - Water retained
  - Type of improvement (trees, etc.)
- **Key Co-Benefits**
  - Habitat creation
  - Business investment
  - Human health improvement
  - Energy Reduction

Green Streets Co-Benefit Calculations



Potential Non-Structural Strategies

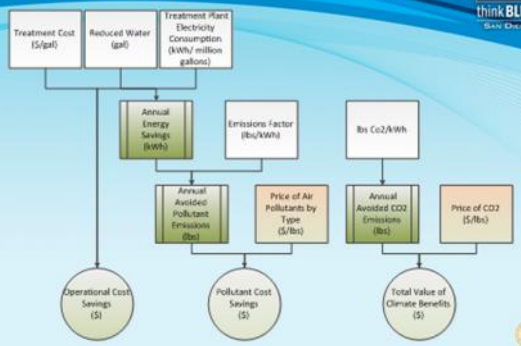
- **Increase # of structural systems**
  - Training, promotion, etc.
- **Improve structural systems performance**
  - Design codes, monitor, etc.
- **Initiatives to change behavior**
  - Education, enforcement, outreach, reduced pesticides, etc.
- **Initiatives to reduce pollutants directly**
  - Street sweeping, protect natural areas, etc.




Co-Benefits of Water Harvesting Strategy

- **Unit of Measure**
  - Reduction in stormwater runoff
- **Drivers of Impact**
  - Less water processed
- **Key Co-Benefits**
  - Reduced water consumption, less municipal water diversion
  - Reduced energy use and air pollution, GHG impacts

Water Harvesting Co-Benefit Calculations



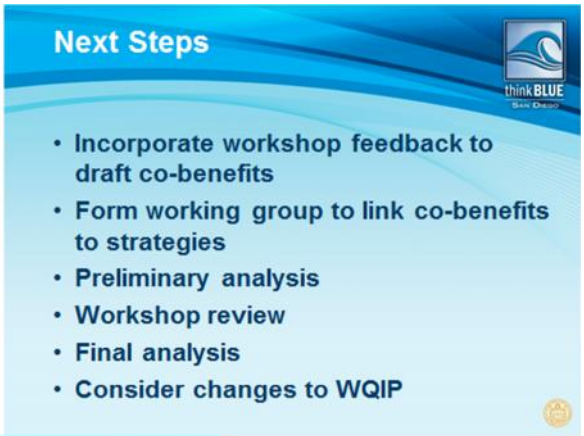
Co-Benefits of Education / Promotion of Think Blue Campaign

- **Unit of Measure**
  - # of people reached
- **Drivers of Impact**
  - # of people who reduce litter
- **Key Co-Benefits**
  - Improved residential neighborhoods aesthetics
  - Increase in business investment reduction in crime

Think Blue Program Co-Benefit Calculations (Partial)

- **Evidence**
  - Cleaner environments leads to decrease in crime
  - Urban housing with higher levels of vegetation and clean street showed decline in crime in nearby buildings


Breakout Session
Property Owners
Aesthetics
Flood Control
Business Investment
Environmental
Green House Gas Reductions
Habitat Creation
Soil Stabilization
General Public
Recreational
Human Health
Stewardship
Heat Island
Air Quality
Crime Reduction
Operational Cost Savings
Jobs
Other
?


Next Steps
• Incorporate workshop feedback to draft co-benefits
• Form working group to link co-benefits to strategies
• Preliminary analysis
• Workshop review
• Final analysis
• Consider changes to WQIP


Closing Remarks
Questions?
Thanks for your participation!

Workshop Handout:

Water Quality Improvement Plans Co-Benefits Description Workbook

Co-Benefit: Aesthetics

Description: Visually appealing environments in communities, especially neighboring properties

Unit of Measure: Area of BMPs or Reduction in Street Debris

Drivers of Value: # and Type of BMP, # of Affected Properties, Proximity to BMP, % increase in Property Value

Unit of Value: $ increase per property

Comments:

Co-Benefit: Air Quality

Description: Reduction of pollutants which cause health impacts

Unit of Measure: Tons of Pollutant

Drivers of Value: Reduction in Energy Use, Increase in Absorbtion of Air Pollutants

Unit of Value: $ per ton of pollutant reduced

Comments:

Co-Benefit: Business Development

Description: Increase in investment and revenue in clean, walkable environments

Unit of Measure: Area of BMPs or Reduction in Street Debris

Drivers of Value: # and Type of BMP, # of Affected Properties,

Proximity to BMP, % pedestrian activity

Unit of Value: $ increase in retail sales

Comments:

Co-Benefit: Crime Reduction

Description: Clean/green neighborhods reduce incidents

Unit of Measure: Area of BMPs or Reduction in Street Debris

Drivers of Value: # and Type of BMP, # of Affected Properties,

Proximity to BMP, % decrease in crime incidents

Unit of Value: $ per incident reduced

Comments:

Co-Benefit: Environmental Stewardship

Description: Increased awareness and environmental responsibility

Unit of Measure: # of persons educated

Drivers of Value: Population

Unit of Value: # of persons educated

Comments:

Co-Benefit: Flood control

Description: Reduced flood risk

Unit of Measure: Area of BMPs or Reduction in Street Debris

Drivers of Value: $ Cost per flood

Unit of Value: $ per flood damage reduced

Comments:

Co-Benefit: Green House Gas Reduction

Description: Reduction of CO2

Unit of Measure: Tons of CO2

Drivers of Value: Reduction in Energy Use, Increase in Carbon Sequestration

Unit of Value: $ per ton of CO2 reduced

Comments:

Co-Benefit: Habitat Creation

Description: Protection or Creation of habitats

Unit of Measure: Area of BMPs or Reduction in Street Debris

Drivers of Value: Acres of urban habitat protected/create

Unit of Value: $ per reduced heat related illness

Comments:

Co-Benefit: Heat Island Reduction

Description: Reduced ambient temperatures

Unit of Measure: Area of BMPs

Drivers of Value: # of Reduced Heating Degrees Days

Unit of Value: $ benefits from reduction in health

Comments:

Co-Benefit: Jobs

Description: Increase in # of local jobs in installation and maintenance

Unit of Measure: Capital & Maintenance Expenditures

Drivers of Value: $ spent

Unit of Value: Number of jobs created

Comments:

Co-Benefit: Operational Savings

Description: Reduction in energy use to process water

Unit of Measure: Gallons of water reduced

Drivers of Value: Cost per gallon processed

Unit of Value: $ per gallon of Water Reduced

Comments:

Co-Benefit: Public Health

Description: Reduced exposure to pesticides and other chemicals

Unit of Measure: Area of BMPs or Reduction in Street Debris

Drivers of Value: # and Type of BMP, Ton of chemicals reduced

Unit of Value: $ per ton of chemicals reduced

Comments:

Co-Benefit: Recreation

Description: Increase in walkable environment

Unit of Measure: Size of recreational facility

Drivers of Value: Number of Recreational Users

Unit of Value: $ per recreational user

Comments:

Co-Benefit: Soil Stabilization

Description: Reduction in soil erosion

Unit of Measure: Area of BMPs or Reduction in Street Debris

Drivers of Value: Acres of Stabilized Soil, Cost of Land Damage

Unit of Value: $ per acre of soil protect

Comments:

Workshop Comments Received

	Structural		
	Green Infrastructure (co-benefits)	Multi-Treatment Areas	Water Quality Improvements
1	Given that on the mesas, we have mostly clay soils that do not absorb storm water runoff, some of these potentials are limited. However, implementation of cisterns, vegetated filter strips, etc. have the potential to * Decrease flood risks as water is released into existing creeks over a longer period of time * Improve habitat as habitat is changing due to excessive water from urban run off (especially dry weather run off) * Dry water flow diversions will also reduce the excessive flows in many of our streams (compared to historical conditions)		
2	Topographic Blending of BMP/IMP approaches: upper watershed, mid, lower, coast Need to think beyond MS4 Parkways/sidewalks as filters, volume reduction, peakflow	Athletic Fields Parks - temp flooding,sedmiment capture	Micro - capture/treat; avoid regional systems Let habitat/green space do treatment
3	Comprehensive approach to improve water quality, reduce storm runoff and dry weather flows while providing education/outreach, as well as improving quality of life (improved feeling of "wellness", reduction in health costs associated with polluted and/or stressful environments). Weight native landscapes (endemic to location) to give higher value than standard palette approach that uses species that excel in erosion control and/or coverage to meet landscaping sign off criteria as quickly as possible	Construct facilities (e.g. detention basins) that are specifically designed for the location versus "cookie-cutter" approach to design and implementation. Favor designs that can be passively converted back to native landscapes (e.g. basin becomes a wetland). Weight native landscapes (endemic to location) to give higher value than standard palette approach that uses species that excel in erosion control and/or coverage to meet landscaping sign off criteria as quickly as possible. Factor in maintenance needs (costs, access, mitigation, permits) and responsibilities into design and implementation. Consult with other divisions and departments within the City, as well as consultation with key stakeholder groups (neighboring communities, jurisdictions, NGOs that include	KEY CO-BENEFITS - Eliminating dry weather flows and reducing peak flows of storm runoff will provide a suite of co-benefits. Freshwater itself causes problems when inputs become perennial (e.g. habitat conversion, non-native species introduction and establishment, vector breeding habitat). More effective management and (hopeful) elimination of dry weather inputs could provide co-benefits by reducing the aforementioned impacts and assist in efforts to mitigate and, eventually, remediate them. Eliminating dry weather inputs will be needed for compliance for the Los Penasquitos Lagoon's Sediment TMDL, since restoring salt marsh habitat within the lagoon in areas recently converted to brackish/freshwater habitat is one of the key compliance targets. Eliminating dry weather flows will also assist in compliance with the County-wide bacteria TMDL, since many "hot spots" are created or exacerbated by dry weather flows. Peak flows of storm runoff augmented by MS4 design or placement can create

	Structural		
	Green Infrastructure (co-benefits)	Multi-Treatment Areas	Water Quality Improvements
		non-profit management entities) to avoid conflicts in BMP implementation that include violation of NPDES permits, TMDLs, downstream impacts to receiving water bodies and valued habitats, creation of breeding habitat for harmful vectors, etc.	another suite of nasty things with regard to water quality that include loaded and delivery of contaminants to receiving water bodies, as well as contribute greatly to erosion and downstream sedimentation that create additional maintenance costs (e.g. digging out a box culvert or clearing sediment from a street) and can impact sensitive habitats that include receiving water bodies. Managing peak flows will also be needed to comply with the Lagoon's sediment TMDL, the county-wide bacteria TMDL, and load reductions for constitutes of concern and other harmful pollutants (e.g. pyrethroids) that cause impacts but have yet to be labeled "constituent of concern." Co-benefits of water quality improvements will need to consider improving the conditions of receiving water bodies (reduced bacteria loads, loss of functional habitats native to the region) rather than box checking to meet compliance targets (reduction of % of load by certain date, sending X amount of educational fliers out to communities). This will most likely involve consideration of qualitative data at some point, which should be captured some how (e.g. using it to weight criteria or alternatives under consideration. 10 Need to internalize costs associated with unintended and/or offsite consequences. For example - habitat conversion or creation of vector breeding habitat as a result of lowflow diversion that simply moves dry weather runoff somewhere else instead of addressing source(s) of the dry weather flows.
		Follow a comprehensive approach that considers benefits and impacts of both individual BMPs and a network of BMPs implemented throughout the watershed, including 9 receiving water body and valued habitats. Avoid knee-jerk reaction of putting out fires at specific locations. Rather, develop a comprehensive and adaptive approach that can be phased in over time to address water-quality priorities throughout their stages (shortterm, mid-term, long-term), take advantage of windows of opportunities (e.g. grant funding ops) and efficiently use available funding while setting up justification for future (and, when needed continuous) funding needs.	
4	Possible portable water purification systems that operates on solar/wind energy	Treat the water before it enters the main body of water (canal, creek, river, lagoon, bay, ocean) by means of detention ponds, catch basins, vaults, diversion systems, sump wells, or any underground storage unit.	Removing bacteria and metals that are associated with trash and run-off.
5			

	Non-Structural			
	Increase Number of Structural Systems (co-benefits)	Improve Structural System Performance	Initiatives to Change Behavior (co-benefits)	Reduce Pollutants directly
1	Stream and/or habitat rehabiliation projects will increase biological diversity and provide more nature in our neighborhoods. Multi-treatment areas when focused on habitat restoration will enhance recreational opportunities, improve air quality, enhance aesthetics, contribute to heat island reduction, create jobs for upkeep and maintenance and providing living laboratories for our children to take their classroom learning into the field.		Initiatives to educate public and professional users of pesticides, herbicides and fertilizers will increase human health. Requiring interagency teams to deal with issues of homelessness will increase public safety while at the same time reducing feces and other toxic substances in our water. Initiatives to encourage proper disposal of pet waste will increase human health Initiatives to more quickly remove trash from recreational areas to keep them out of surface water will also improve recreational experiences and increase human health by limiting the amount of food available to rodents and hence reduce the rat population. Insuring that trash containers are available in all areas will keep trash out of surface water and will also improve recreational experiences and increase human health by limiting the amount of food available to rodents and hence reduce the rat population.	

	Non-Structural			
	Increase Number of Structural Systems (co-benefits)	Improve Structural System Performance	Initiatives to Change Behavior (co-benefits)	Reduce Pollutants directly
2	School Cirriculum, Incentives			
3	Improve or replace existing MS4 structures before building new ones when feasible (the City cannot maintain what it has now, let alone new structures) Hire additional staff to manage permits and contracts to third-parties hired to assist Storm Water Division. improve enforcement actions (e.g. controlling dry weather runoff that meets water quality criteria or circumvents MS4 (e.g. freshwater mounding) but still creates impacts to receiving waters, such as habitat conversion, invasive plant establishment, breeding habitat for disease transmitting vectors).	Design and implement monitoring programs that make sense (e.g. answers questions or generates useful data) rather than just following programmatic lines. Review and enforce third-party agreements (e.g. HOAs maintaining private BMPs). Provide incentives to landowners and businesses to comply with hydromod requirements in areas already developed (and exempt from hydromod regs)	Coordinate with other stakeholder groups (e.g. NGOs) to help promote efforts that provide co-benefits to local communities and clarify/modify resource regulation that does not apply or should not in certain cases where lines of evidence support the effort over the regulation. Promote and incentivize native landscapes and water re-use	Improve controls over dry weather flows to address freshwater mounding and seepage into the MS4 or open space areas. Remove City infrastructure (e.g. MS4, sewer lines, water lines) from sensitive lands (e.g. Los Peñasquitos Lagoon).
	Include lessons learned from case studies regarding design, implementation and maintenance. Use site specific design and implementation rather than cookie-cutter approach to BMP and private properties (e.g. Hansen Agregate). Re-locate businesses built and operating in the flood zone (e.g. Sorrento Valley) as a longterm solution that is more cost-effective than annual maintenance and lawsuits.			

	Non-Structural			
	Increase Number of Structural Systems (co-benefits)	Improve Structural System Performance	Initiatives to Change Behavior (co-benefits)	Reduce Pollutants directly
4	Private properties, as mentioned by the participants of the meeting on May 20th. (My company has had the privilege or working with Barona Casino I Barona Creek Golf where we found that they recycle all or their water run-off including rain, pavement, parking structure, landscaping and irrigation, which they all filter into one pond system for treatment. In addition, they are in the process of building reservoirs.}	Retrofit new proprietary technologies into existing structures by enhancing performance, focusing on set goals of contaminants of concern as overseen by SDRWQCB, EPA, etc. (Quantum Ozone has retrofitted into an existing vault/Catch Detention System prior to entering into a State Park, into a County Flood Tunnel, and also into existing ponds/lakes/reservoirs. We are open to any county/city or private property that would be willing to co-venture on a pilot project.)	Research outside the box of standard set BMP guidelines, to more natural /innovative technologies that are not part of existing BMPs. For example, ozone is 3,125 times more powerful than chlorine, and the misconception of it being "harmful" is due to lack of education. When properly applied, ozone will not cause negative bi-products, as Quantum Ozone has proved by not producing one negative bi-product in 7 years. We are an ozone planet, constantly having 0.02 parts per million of ozone constantly around us naturally.	Ground level education and awareness to future generations (3rd grade on up) to have Environmental Stewardship as part of the school curriculum along with' history and math, so that the governments that they create in the future will have these ideas naturally implemented into city maintenance and daily living.
5				Strategy: Elimination, to the maximum extent possible, of toxic chemicals in the environment, including herbicides, pesticides, detergents, poisons, paints, and petrochemicals. Co-benefit: an urban ecosystem that supports, to the maximum extent possible, a functioning food web from micro organisms to invertebrates and vertebrates. Co-benefit: recreation and educational opportunities in the form of diverse and inter-dependent organisms to observe and study. Co--benefit: swimmable and fishable waters.

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