

# Representing MS4 Permittees at the State & National Levels

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Minnesota Cities Stormwater Coalition



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## Minnesota Cities Stormwater Coalition

- About 120 MS4 cities
- Each city pays an annual fee
- Directly affiliated with the League of Minnesota Cities
- Steering Committee of about 12 cities
- One staff person



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# Minnesota Cities Stormwater Coalition



- Annual budget of \$85,000 to \$90,000

MCSC Annual Fee Schedule	
City Population Range	Annual Fee
0 - 3,000	\$410
3,001 - 6,000	\$515
6,001 - 10,000	\$620
10,001 - 20,000	\$760
20,001 - 30,000	\$965
30,001 - 50,000	\$1,240
50,001 - 100,000	\$1,790
Saint Paul	\$4,500
Minneapolis	\$5,500

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# Minnesota Cities Stormwater Coalition



## Core ideas

- Regulation is both technical and political
- One city working with a state agency = imbalance
- 120 cities working with a state agency = balance
- You have to be “at the table” to help shape the regs
- Cities should share important information, news, and materials
- Just the regulated cities
- We want the regs to “meaningful & manageable”

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# Minnesota Cities Stormwater Coalition



- Direct affiliation with the League of Minnesota Cities
- One of the most active and sophisticated National League of Cities state chapters - 7 full-time lobbyists
- I work with one lobbyist all the time
- State regulator has seven staff levels
  - Commissioner to operational staff
- We decide how to work each level and split up tasks
- Fundamentally defines political influence for the regulated cities
- Our relationship with our regulator is “complicated”

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# Minnesota Cities Stormwater Coalition



- Started in 2002 – the Phase II MS4 Permit
- Produced a Guide Plan to help cities through the permitting process
- More useful guidance than our State agency was able to provide
- Shaped how permit documents (SWPPP) were defined
- Became MCSC in 2006

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# Minnesota Cities Stormwater Coalition



- I have been MCSC's sole staff since 2002
- Consultant under contract to MCSC
- About 80 to 110 hours per month
- I attend all stakeholder meetings
- **Unsolicited performance review** - *"I don't know if you're on Randy's mailing list, but if you're not I'd suggest you consider it. Randy was hired a few years ago by many of the MN municipalities to represent them with stormwater issues when dealing with EPA and MPCA. He's quite radical and enjoys getting in the face of the compliance agencies. He looks like an aged hippie, is very smart, well spoken, and defends those he represents. But sometimes on Webcasts I've observed, you wish he'd just shut up and quit wasting everyone's time in arguing with MPCA. But he is very well respected by MPCA."*

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# Minnesota Cities Stormwater Coalition



## Major tasks

- Negotiate permit language
- Share example permit submittal & program documents
  - MCSC FTP site
- Periodic E-mails to MCSC members and others
- Represent MS4 cities on state initiatives
  - TMDLs, State rules, WQ standards, Impaired waters lists, Stormwater reuse guidance
  - Sometimes it's "hardball"
- Lobby for stormwater research and stakeholder involvement

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# Minnesota Cities Stormwater Coalition

## Questions?



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## What is NMSA?

An alliance of state and regional groups comprised of MS4 permittees that is solely focused on MS4 issues



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# Problem statement



*“Stormwater runoff is the only major source of water **pollution** that is **increasing** in many parts of the U.S.; however, stormwater infrastructure is still often **considered a secondary or ancillary infrastructure segment**.*

*In order to meet the rising challenge of stormwater pollution, **source control must be improved and the function of stormwater infrastructure must be enhanced.**”*

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# Motivation for Formation

- To represent MS4 permittees at the national level by providing a **unified voice**
- To lead changes in regulation both **proactively and reactively**
- To **connect and unite** MS4 programs
- To promote stormwater as a **resource**
- To improve the **public image of stormwater**
- To create opportunities for **multi-benefit and multi-use stormwater projects**



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# Vision for NMSA



- NMSA's vision is to **provide clean water for the nation**
- This vision will be met through the following supporting principles:
  - Provide **efficient** programs
  - Provide **effective** programs
  - Base decisions on **science**

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# Our Action Areas



- **Sector Support and Information**
- **Messaging & Communication**
- **Education**
- **Policy/Advocacy**

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# Sector Support and Information



- Explore topics and related projects at a national scope that are of **interest and benefit to MS4s**
- **Coordinate technology and information transfer** at the national level between state and regional-level MS4 groups
- Communicate with member MS4s across multiple topics using a variety of **information dissemination** venues and platforms

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# Sector Support and Information



- Coordinate **with other national organizations** that impact the MS4 sector
- Assist states in managing existing or forming new/nascent **state and regional-level groups** representing MS4 permittees
- Work with **WEF member associations** in a collaborative fashion

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# Messaging & Communication



- Distribute information about **court rulings** and new rules & regulations
- Collect, reformat, generate, and distribute **public education materials** related to MS4 programs and policies
- Explore **national media campaign(s)** to amplify public education for stormwater

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# Education



- Provide **exchange forums** for MS4 permittees
- Support & expand **public education** for stormwater
- Provide or support **technical reports and guidance manuals**
- Host **technical forums**
- Support member **activities and conferences**

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## Policy/Advocacy

- Speak directly with **EPA** staff
- Provide a conduit to federal **regulatory and legislative** contacts of interest to **MS4 community**
- Provide strategic support on **regulatory and legislative** actions at **state/local level**
- Provide formal **comments on federal regulatory proposals** from the perspective of MS4 permittees

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## Policy/Advocacy

- Provide **timely communications on pending and ongoing regulatory and legislative actions** impacting the MS4 community
- Provide **policy analysis** to MS4 community
- Coordinate and work with other national groups to **amplify messages on MS4 issues**

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# Where we are now



- We have **incorporated** as a 501(c)(3)
- Have received the **non-profit status approval**
- **Executive Committee** beginning the work of the organization
- Completed a **charter and recommendations** for the organization
- We have formalized an **MOU with WEF** and are part of the WEF Stormwater Institute

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# Member Groups

- State/regional groups of MS4 permittees independently formed in many states
- These groups provide critical support for MS4 programs
- 16 groups currently members of NMSA
  - In discussion with 22 in total
- Other membership level: **Affiliate Members**



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# Current Members



Initial stormwater organizations making up the NMSA membership:

1. Minnesota Cities Stormwater Coalition
2. California Stormwater Quality Association
3. Central Massachusetts Regional Stormwater Coalition
4. Ohio Stormwater Association
5. Tennessee Stormwater Association
6. Indiana Association for Floodplain and Stormwater Management
7. Iowa Stormwater Education Partnership
8. Virginia Municipal Stormwater Association
9. Arizona Stormwater Outreach for Regional Municipalities
10. Louisiana Urban Stormwater Coalition
11. Nebraska Floodplain and Stormwater Managers Association
12. Kentucky Stormwater Association
13. Utah Stormwater Advisory Committee
14. Maine Water Environment Association
15. Pennsylvania Water Environment Association
16. Water Environment Federation

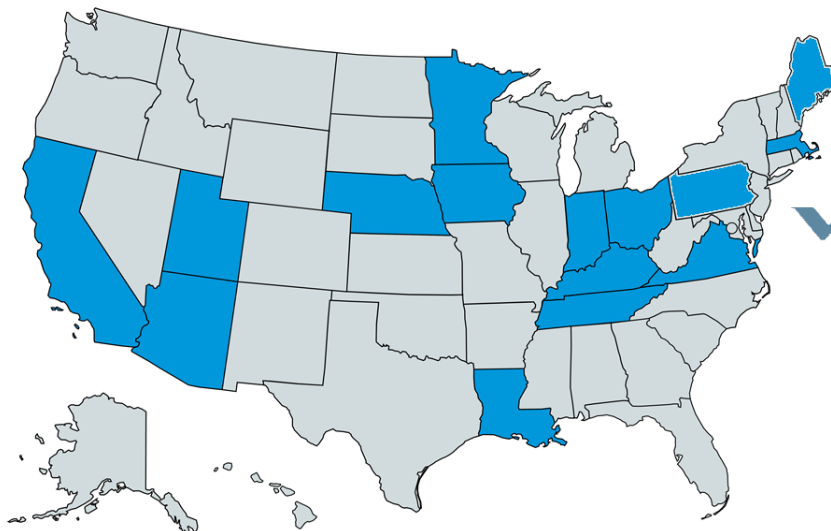
On Deck: Washington, Several Others

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# Current Members



16 organizations across 15 states; 8 of 10 EPA regions covered:



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# Statewide Stormwater Organization Considerations

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## Statewide Stormwater Organization Benefits

- Speaking as a **uniform voice** to the regulatory agency
  - Comments on permits and other actions carry greater weight
  - Demonstrate careful consideration
- **Technology transfer**
  - High performing program elements can be shared
  - Economical education and staff training
  - Establish a network of peer professionals
- **Sector information**
  - Information on regulatory actions and trends
  - Cost information

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# Statewide Stormwater Organization Benefits

- **Program cost reduction opportunities**
  - Legal fees
  - Statewide guidance manuals
  - Statewide public education programs
  - BMP information sharing
- **Program improvement opportunities**
  - Source control projects
  - Regional BMPs
  - Watershed planning

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# Statewide Stormwater Organization Benefits

- WQ programs must be **collaborative and adaptive** to be successful
  - A statewide stormwater organization will support these objectives
  - A statewide organization will have a **stronger voice** within the state and nationally
- Member programs will be stronger with **access to more resources**
- Provide a vehicle for **staff improvement** and helps to **retain professionals** in the industry

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# Get Involved



- Visit our website at [nationalstormwateralliance.org](http://nationalstormwateralliance.org)
- Leadership



### Working Together, We Will:

- Develop a unified national voice for local MSW permittees
- Advocate on behalf of MSW permittees and seek regulatory changes that improve the efficiency and effectiveness of stormwater programs across the country
- Connect MSW programs and staff to share and build on the body of stormwater knowledge and expertise
- Help create a culture of public engagement where stormwater is a resource and investment in effective stormwater management is supported
- Promote stormwater solutions that provide multiple benefits



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# Questions?

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