

Why CSFA is Relevant to water and sewerage authorities

CSFA is relevant to authorities because it carves out a *potential* role for them. It in no way requires any authority to take on managing stormwater, but it permits an authority to do so in partnership with a local government that holds an MS4 permit.

An authority might decide to participate in a stormwater utility partnership for a number of reasons. Doing so could cultivate good will, help accumulate “political capital,” or burnish the reputation of the authority and its staff. An authority might feel doing so is a public service and a way to fulfill its mission. Managing stormwater might be a cost-effective way to meet a NJPDES permit. It may reduce costs to achieve TMDL or costs to treat surface water for distribution in the drinking water system. It could be considered a sort of point-non-point source trading and a way to avoid wasting authority funds in treatment plant upgrades. In many places, without stormwater improvements, point source improvements will not result in environmental benefit. The stormwater utility may provide greater control within the watershed to improve water quality. Eliminating I&I might free up capacity in a sewer collection system or treatment facility or help eliminate the need for pump station upgrades.

A municipality could be motivated to form a stormwater utility and do so in partnership with an authority because stormwater management costs are not subject to the two percent municipal budget cap.