



A Clear Commitment to America's Waters

The National Association
of Clean Water Agencies'
Strategic Watershed
Action Planning Session Report

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1/5/07 DRAFT

NACWA's Strategic Watershed Action Planning Session Report

Background and Overview

The National Association of Clean Water Agencies' (NACWA's) leaders from across the nation met in Kansas City, Mo., on December 12, 2006, to conduct an *Action Planning Session (Session)* to develop NACWA's *Strategic Watershed Agenda*. The *Session* was designed to explore seven key emerging issues for the Association, and to brainstorm various courses of action for NACWA to follow in the coming year. The goal of the *Session* was to produce a "road map" for future NACWA activity related to water quality improvement and to provide a forum to think strategically about the key topics.

NACWA's President Dick Champion, Director, Independence Water Pollution Control Department, Mo., and *Session* host Franklyn (Frank) Pogge, Director, Kansas City Water Department, emphasized at the meeting that 2007 heralds the 35th anniversary of the Clean Water Act, as well as a new Congress with new leadership. They explained that NACWA would remain true to its traditional advocacy agenda, but also that the Association must explore new initiatives on key emerging issues that advance the goals of the clean water community.

This *Report* summarizes the discussion from the *Session*. It is organized into subject areas that match the seven topics that were the focus of the facilitated *Session*. These were:

- **Clean Water/Drinking Water/Water Reuse;**
- **Nonpoint Sources;**
- **Urban/Suburban Stormwater;**
- **Wetlands;**
- **Green Infrastructure;**
- **Collection Systems; and**
- **Septic Systems.**

A brief paragraph introducing the topic area is included at the start of each of the first seven *Report* sections. Each *Report* section is then divided into four organizing subsections into which much of the discussion naturally fell. These are:

- A. ***Overarching Themes*** – which outlines the broad, thematic concepts that were discussed;
- B. ***Outreach and Education*** – which discusses steps that can be taken to better inform and educate the public and key stakeholders;
- C. ***Advocacy*** – which discusses steps that can be taken to enhance future advocacy-based initiatives; and
- D. ***Research and Development*** – which addresses potential next steps to fill in data gaps that could impede progress in ensuring water sector progress.

These subsections were developed after the *Session* to summarize and categorize the many comments made during the day's dialogue. The subsections and the individual comments may overlap; to the extent practicable the bullets reflect actual comments of the participants. Individual recollections may help to elaborate and further refine this *Report* in the future. The *Report* will be used in a variety of ways to inform and guide NACWA activities in 2007 and beyond, and will be used by the *Strategic Planning Committee* to draft proposed revisions to NACWA's *Strategic Plan*.

The Association appreciates the effort taken by all who took the time to attend and participate in the *Session*.



I. Clean Water/Drinking Water/Water Reuse

NACWA has increasingly heard stakeholders use the expression “water is water,” meaning that the divide between the traditional regulatory categories of wastewater and drinking water is shrinking. With this, traditional jurisdictional boundaries are being challenged and “silo” thinking is becoming obsolete. NACWA wants to identify opportunities to tackle the challenges presented by the convergence of these two regulatory schemes, which can no longer be viewed independently.



Both the Clean Water Act (CWA) and the Safe Drinking Water Act (SDWA) pertain to and influence source water protection, among other issues. As EPA contemplates water quality standards for bacteria, and as unregulated emerging contaminants raise concerns in many regions of the country, the role of clean water agencies in source water protection efforts will become more prominent. Also, even though water reclamation and reuse have enormous benefits, especially in the arid west and areas experiencing water shortages, public acceptance of this practice continues to be a challenge. The relationship between the regulation of water quality and water quantity remains an evolving issue.

A. Overarching Themes

- The water industry must speak with a single voice in Washington, D.C. and across the U.S. in order to bring about needed changes.
- To the public, “water is water,” without regard to the current artificial structures and programs addressing drinking water and wastewater separately.
- Wastewater treatment professionals and drinking water suppliers all serve the same public and customers. An integrated planning approach is needed.
- Assuming “water is water,” the biggest questions are who pays for water quality improvements, and how?
- A significant portion of the drinking water industry is private, while the wastewater industry is largely public. How do we reconcile these different structures and different goals (profit vs. value for ratepayers)?
- It is essential to break down the U.S. Environmental Protection Agency’s (EPA’s) silos, i.e., separate enforcement, wastewater and drinking water offices, etc.
- We are stuck in “paradigm paralysis” – the inability to think outside our silos, and we must break down these barriers.
- Strategic alliances among NACWA, the Water Environment Federation (WEF) and the Water Environment Research Foundation (WERF) provide the opportunity to put some jet fuel into our efforts.
- We must stop giving water away. We need market value for water to achieve water quality goals.

B. Outreach and Education

- Water agencies need a proactive approach to generate public support to address emerging contaminants.
- We must educate the public about the difference between perceived risk vs. real risk, and try to provide a realistic view of actual public health risks. For example, we should address the impacts of being able to detect increasingly smaller pollutant levels using increasingly sensitive analytical methods.
- We must educate decision-makers, who need to have the political will to commit the resources necessary to improve water quality.
- Clean water agencies need to feature pilot or case study examples of collaborative efforts, such as a wastewater utility working with a downstream water provider on a reuse project.
- We must educate legislators about nexus between drinking water and wastewater.
- We should inform the general public about local watershed success stories, while at the same time developing a plan for a broader watershed act.
- Clean water and drinking water professionals should resolve issues without simply “pointing fingers” at each other.

C. Advocacy

- In addition to traditional CWA/SDWA issues, NACWA needs to consider crosscutting issues with the Endangered Species Act.
- Clean water agencies, which have practical knowledge and experience, can improve upon the narrow approaches taken by regulators. We must take the lead on crosscutting water issues, including source water protection.
- We must start the battle to create new legislation that can replace both the CWA and SDWA, and develop a plan for a broader watershed act.
- We must be realistic in our approach to these advocacy goals – not all wastewater needs to be treated to the same level, i.e., it doesn’t all need to meet drinking water standards.
- Regulators must become part of the solution in allocating funding differently. We need one pot of money for drinking water and clean water solutions.
- Advocacy efforts must educate the public about emerging contaminants, and must address the most cost-effective way to prevent or remove endocrine disrupting chemicals, whether at the wastewater plant or drinking water plant, or through pollution prevention.
- In considering options, the clean water community should consider cost-effectiveness, and low-income and affordability issues.
- EPA’s watershed approach is not effective at the regional/state level; NACWA should work with WEF/WERF to develop a punch list of what we need to do to make this approach viable.
- In the security arena, the Water Sector Coordinating Council (WSCC) – with representatives from eight water sector organizations – cooperated on drafting the water sector’s security plan over six months. This is a potential model for drafting a watershed-based program with some real teeth that could be sent to EPA.
- Water professionals need a framework, organization, or forum to work collectively on these crosscutting issues.

D. Research and Development

- Additional research is needed so that regulations are based on science, not public perception.
- We need regional and site-specific scientific information to truly achieve water quality improvements.
- We need clearer definitions of costs vs. benefits to ensure that money is targeted to the biggest problems first.

II. Nonpoint Sources

NACWA has long argued that water quality goals will not be met in the absence of a concerted and viable strategy for addressing nonpoint sources of pollution. According to EPA figures, nearly half of U.S. waterways do not meet water quality standards, and nonpoint sources of pollution remain the greatest obstacle toward achieving the fishable, swimmable goals prescribed in the CWA. Specifically, agricultural runoff is the single largest uncontrolled source of contamination of U.S. rivers and streams. One potential solution is to tackle the stormwater/nonpoint source problem through a broad-based approach that incorporates a variety of control strategies.



NACWA's aggressive involvement in the upcoming Farm Bill negotiations will further spotlight the breadth and gravity of this problem while informing lawmakers and the public of the need to boost funding significantly for agricultural incentives to achieve real water quality improvements. In addition to a white paper, *2007 Farm Bill Reauthorization and Potential Benefits for NACWA Members*, the Association has drafted legislative language for review that will be shared with other stakeholder groups and with members of Congress and their staffs.

A. Overarching Themes:

- Clean water advocates should overcome fear of corporate agricultural lobbyists, but should maintain realistic goals, especially concerning stricter regulation of the agricultural community.
- Leaders must grapple with need to send money from cities to agricultural areas.
- Nonpoint source pollution is not only generated by agriculture; it also includes community stormwater (even though the CWA defines stormwater as a point source). It also includes significant air deposition and needs to be viewed on a holistic, integrated basis.
- Discussions about nonpoint source controls must occur in the context of sustainability.

B. Outreach and Education

- We can do more public education to help farmers understand that they are part of the problem.
- We need to educate the public about the impact of auto emissions and other individual contributions to nonpoint source pollution.
- We need to take lead in educating public and elected officials. Taking the approach that wastewater utilities are not the problem, however, may not be well received by some people.
- We need to identify the key players in the agricultural community and work together to address the problem. For example, companies that produce the pesticides need to work with the farmers who use their products, with increased training on application and proper use.

C. Advocacy

- The clean water community should identify ways to advocate for more controls on nonpoint sources of pollution without appearing to shift the responsibility for clean water to other responsible parties.
- The clean water community should advocate for a rational, market-based trading program between clean water utilities and nonpoint sources of pollution.
 - Some participants believe trading is an undesirable approach, believing it only moves money from urban areas to rural areas. Trading is a controversial issue.
- Power plants are a major source of water quality impairment and we need take a leadership role in pursuing meaningful controls beyond existing regulations to address this issue.
- A national monitoring program or expanded monitoring is needed to demonstrate to farmers the water quality impacts of their agricultural operations; then they will come to the table and help find solutions.
- Clean water advocates should ensure that federal money given to agricultural interests for water quality improvement is used for that purpose, and should ensure accountability.
- EPA should simplify the process of developing the nonpoint source component of total maximum daily loads (TMDLs).
- The activities of the Chesapeake Bay Commission could be used as a model in national Farm Bill negotiations.
- NACWA should work with conservation groups on the Farm Bill.
- NACWA should identify key members of Congress and tailor its messages to local experiences of those members who will influence the Farm Bill.
- NACWA should engage further with the U.S. Conference of Mayors, the National League of Cities and other municipal groups.

D. Research and Development

- Utilities can lead in collecting data and developing sound science. People rely more on sound scientific information than on wastewater utilities' representations.
- We need to ensure that we have accumulated the data to demonstrate that the nation's water quality issues are not solely the responsibility of wastewater agencies. It is easy for utilities to be blamed, and without reliable data, we will be saddled with controls that do little to improve water quality.
- The clean water community should fill in the science gaps concerning relevant source contributions such as contributions from individual actions, i.e., metal from automobile brakes vs. urban runoff vs. actual point source discharges.
- Lots of data already exist; we need to share more of this information with the agricultural community.

III. Urban/Suburban Stormwater

Addressing stormwater means refocusing efforts to control urban runoff. This involves challenging traditional "silo" thinking because stormwater management responsibilities may fall under an independent municipal jurisdiction, and may require new partnerships to address these challenges.

Some NACWA member agencies are already implementing innovative programs to address stormwater by acquiring green spaces in urban areas. These green spaces are not only aesthetically pleasing, but also serve to slow and absorb stormwater flows that otherwise might carry pollutants directly into nearby waterways.



A. Overarching Themes

- Stormwater is actually a greater challenge to water quality progress than wastewater.
- The cost component of stormwater is much greater than for wastewater. The cost to remove a pound of pollutant from urban runoff is an order of magnitude higher than through traditional POTW or agricultural controls, but nevertheless is a needed investment if we are to meet water quality standards.
- Stormwater is increasingly becoming the responsibility of wastewater managers, e.g., Kansas City, which will require an integrated approach.
- The clean water community needs new ways to assess stormwater quality improvement and impacts, given the diffuse nature of the discharge. In other words, stormwater not an "end of the pipe" issue.
- Continued population growth will only increase stormwater challenges. Therefore, we need to begin integrating stormwater initiatives and community planning efforts, such as smart growth and urban growth boundaries.

B. Outreach and Education

- The clean water community must educate individual citizens on how each can help control stormwater, e.g., rain barrels in Milwaukee, swales and rain gardens.
- The clean water community should target grade school children with educational efforts, such as Kansas City's 10,000 rain garden initiative.

C. Advocacy

- NACWA should promote the fact that an integrated approach can produce results. For example, Kansas City has 320 square miles of land area with 35 discrete watersheds, and has developed stormwater master plans for all of them. Utilities often cannot separate stormwater from wastewater. By integrating stormwater into a combined sewer overflow (CSO) long-term control plan (LTCP), Kansas City has found tremendous synergies, and will probably realize real gains in both stormwater and CSO controls because of joint management.
- An integrated approach must include public works, water utilities, the power industry and the environmental community. The whole urban watershed must be at the same table.
- NACWA should support efforts to keep water "in place." The tendency of water utilities is to collect and transport stormwater for treatment or discharge in other watersheds.
- Clean water advocates need to bring state and federal departments of transportation to the table. Significant funding is available in the transportation sector, and some needs to be earmarked for stormwater management.
- Stormwater needs to be part of NACWA's long-term agenda, in part, because it connects wastewater with source water protection issues.
- NACWA should work more closely with the National Association of Flood and Stormwater Management Agencies (NAFSMA).
- NACWA should look for ways to increase investment in stormwater systems.

D. Research and Development

- The clean water community needs better data on bacteria from wet weather events in recreational waters.
- NACWA should continue its involvement in development of bacteria criteria.

IV. Wetlands

NACWA views the use of wetlands and national policies promoting their protection as an area of growing importance. An informal survey by NACWA staff found that member agencies are increasingly looking to wetlands as an effective, economical treatment option to reduce nutrient levels in POTW effluent. Their use has been gaining traction as a viable solution that not only captures polluted runoff for



treatment through nature's own filters, but also provides critical wildlife habitat. The efforts of several NACWA members in this arena were touted in an article in the October 27, 2006 issue of *USA Today*. The use of wetlands for treatment also gives NACWA member agencies the opportunity to highlight their roles as environmental stewards implementing cutting-edge technologies and strategies for achieving real water quality improvements.

A. Overarching Themes

- The use of wetlands for water treatment signals a move away from traditional standards or limits to a net environmental benefits approach.
- Integrated resource management and watershed permitting need to play a role in an increased use of wetlands for treatment.
- Maintaining and monitoring constructed wetlands over the long-term can be difficult and costly.

B. Outreach and Education

- NACWA should work with other municipal groups to educate them and the public on the benefits of wetlands.

C. Advocacy

- NACWA could work with Ducks Unlimited on several projects, including a national memorandum of understanding and local initiatives, such as those done in Milwaukee and Independence.
- NACWA should support members' efforts at the local level to undertake constructed wetlands projects, such as those in Chicago.
- NACWA should advocate on behalf of legislation supporting pilot or demonstration projects, which could include funding.
- NACWA should consider advocacy on behalf of utilizing wetlands to address nutrient criteria.
- The clean water community should work with Army Corps of Engineers (Corps) to guarantee a coordinated approach with EPA on wetlands. Federal matching commitments by the Corps and EPA must be honored.
- NACWA should work to preserve the use of wetlands for treatment, and that should guide our involvement in the debates concerning the definition of "navigable waters" and other issues.

D. Research and Development

- Scientists should clarify the risks of vector attraction to wetlands. For example, do constructed wetlands increase the risk for West Nile Virus and other vector-borne diseases?
- Additional research should be conducted to determine the effectiveness of wetlands to meet nutrient criteria.

- Additional information is needed on the benefits associated with wetlands in expanding drinking water supply or reuse opportunities. For example, a pilot project south of Dallas using 2,500 acres of wetlands runs wastewater through the wetlands and pumps it back to Fort Worth for water supply. It provides 20 percent of Fort Worth's water supply needs.
- More research is needed to assess the impact of constructed wetlands on increased methylation of mercury.
- The clean water community needs to understand the fate and life cycle of contaminants in a wetland. Which pollutants can be removed? How do geography and temperature affect removal rates?
- More scientific information on wetlands creation and restoration is needed. Can a wetland be created or restored? Will created or restored wetlands effectively remove pollutants over the long-term? How can complex issues such as management and "die-off" in the winter best be addressed?
- How can we quantify the benefits so we can get credit for achieving standards?

V. Green Infrastructure

NACWA's name reflects its commitment to clean water and the role of its member agencies as environmental stewards. This opens the door not only to new partnerships, but also to a new way of thinking that stretches and challenges traditional boundaries and approaches to meeting existing regulatory requirements. A greater focus on watersheds rather than on individual waters and on innovative strategies to address conventional challenges through unconventional means are components of NACWA's commitment to clean water. What do we mean by green infrastructure? The obvious examples include roof gardens in urban areas. These not only provide a diversion for stormwater, but also can curb the urban heat island effect by reducing the amount of heat absorbing materials exposed to the sun, serve as "sinks" that absorb carbon dioxide, and enhance the aesthetics of urban areas. Other forms of green infrastructure include rain barrels and more porous pavement to reduce the amount of impervious surfaces that contribute so much to the stormwater problem.

While NACWA members generally appreciate the benefits of green infrastructure, they must carefully consider how much of their scarce resources to devote to these types of projects. Green infrastructure involves an investment of time and money, and the exploration of new partnerships. Utilities, however, also need to know that they will reap a real benefit with reasonable assurances that they will get credit for innovative measures they implement.

A. Overarching Themes

- The definition of green infrastructure must be broader than the typical concepts of buffer strips, rain gardens, swales and green roofs. It must incorporate existing waterways (tributaries, streams, etc.) and existing practices such as biosolids land application as green infrastructure.
- Green infrastructure goes beyond wet weather issues, and should include matters such as energy efficiency and the use of biodiesel. Several participants noted that biosolids land application should be considered green infrastructure.

- This issue in particular reflects on the industry’s reputation locally, nationally and globally. Being seen as the leaders in this arena has benefits beyond cost-savings, namely, securing clean water agencies a seat at the table on 21st century challenges such as climate change, among others.
- Unlike daily wastewater management activities, green infrastructure is visible and can be seen and readily understood. This increases credibility with the public and can beneficially impact other wastewater management initiatives.
- Green infrastructure can be costly and must be maintained. It can be a challenge to commit to these projects in view of rising construction and other costs. This is especially true in economically distressed areas.
- Another indirect benefit of green infrastructure is engaging and retaining younger, professional utility employees. They often favor such initiatives and seek to be part of environmentally progressive activity.

B. Outreach and Education

- NACWA should work closely with other infrastructure sectors including transportation and housing and building, among others, to educate them on the benefits of green infrastructure.
- Clean water agencies should conduct inter-departmental education on the benefits of green infrastructure at the municipal level.
- Clean water agencies should include small communities in outreach efforts.
- This is a great opportunity to expand the NACWA network, because the public can relate to green infrastructure projects.

C. Advocacy

- NACWA should utilize success stories such as those in Chicago, Milwaukee and Hillsborough, OR more effectively.
- NACWA should promote members getting credit for green infrastructure in CSO LTCPs.
- Being a leader on green infrastructure provides leverage for advocacy on core issues, especially with non-governmental organizations (NGOs).
- Clean water agencies should incorporate Leadership in Environmental & Efficient Design (LEED) training into utility management plans.
- NACWA should seek to ensure that the maintenance of green infrastructure is “institutionalized.”
- Members may need NACWA support in changing local ordinances to provide greater opportunities for green infrastructure.
- NACWA should work closely with other infrastructure sectors.
- NACWA should promote development of a standardized method of quantifying the benefits of green infrastructure.
- We must proactively define green infrastructure, even if that definition differs from that of the environmental activist organizations to include biosolids, etc. We should not be defensive regarding our definition.

D. Research and Development

- Clean water agencies need more data for specific technologies, such as the effectiveness of porous pavement with different types of soil.
- The clean water community should partner with academia to fill data gaps.
- Clean water agencies need help in quantifying benefits of green infrastructure, a very complicated issue.
- Because of the complex nature of quantifying green infrastructure benefits, there must be a simple matrix for doing so or else efforts will stall.

VI. Collection Systems

As NACWA renews its push for a consistent national rule to address sanitary sewer overflows (SSOs), the role of collection systems cannot be overstated. Aging and poorly managed collection systems result in greater amounts of wastewater being delivered to treatment plants. These aging systems also contribute to more SSO occurrences. NACWA wants to bring collection systems to the table in this important dialogue and develop a thoughtful way to factor them into the Association's advocacy efforts. The challenge in doing so, however, as with the case of drinking water utilities and stormwater control agencies, is the issue of separate jurisdictions and the lack of a holistic approach to deal with these challenges.

A. Overarching Themes

- SSO/Collection System issues must be addressed via a watershed-based approach. Otherwise municipalities will be spending millions to address a *de minimis* contribution to the water quality impairment problem.
- Is there inconsistency between a narrow approach seeking a specific policy for SSOs (NACWA's current effort) and a broad, watershed-based permitting approach? If, so, can these be reconciled?
- One approach to addressing SSOs is simply to pay a fine, given the minor water quality benefits that would result from costly investment in developing and implementing a national policy.

B. Outreach and Education

- NACWA should reach out to environmental and municipal NGOs to establish a viable voluntary standard or national rule to address collection system issues.
- NACWA should gather and provide examples of centralized authorities working with satellite collection systems collaboratively (not via enforcement) to solve SSO and wet weather management challenges.

C. Advocacy

- A national rule that would set consistent standards and bring collection systems under the NPDES permitting program is needed.

- Absent a national rule, states will step in and create inconsistent regulatory regimes, e.g., California's wastewater discharge regulations, and inconsistent enforcement actions/consent decrees.
- NACWA should monitor state regulations closely and gather information on implementation of the capacity, management, operations and maintenance (C-MOM) program to aid efforts to get a national rule. NACWA should push C-MOM as a national standard.
- NACWA should advocate separating collection systems from utility satellite systems as a matter of law, thereby ensuring that EPA will address satellite systems directly instead of through POTWs.
- In the absence of a rule, NACWA and fellow organizations could create a voluntary standard for collection system management with broad industry buy-in that could then be leveraged into a national policy.
 - Calling this a BMP likely is preferable to calling it a standard.
 - Some support was expressed for separating the C (capacity) from the MOM (management, operations and maintenance).
- NACWA should explore a legislative fix and hearings, with hearings focused on the onslaught of litigation and citizen suits in this arena.
- A more realistic design storm threshold would help utilities address concerns over moving from a 5-year to a 10-year design storm threshold, such as that which Wisconsin is seeking in consent decrees.
- NACWA should promote a national rule or viable voluntary standard.

D. Research and Development

- The clean water community needs a better understanding of the relative contribution to pathogen contamination from humans versus animals, wildlife, etc.

VII. Septic/Decentralized Systems

Septic tanks, also known as decentralized systems, pose an emerging challenge to meeting water quality goals. As communities expand further from the center of cities, they also move away from existing networks of the water and sewer infrastructure. The *Session* explored the best way to proceed on this issue. Anti-sprawl activists argue against extending water and sewer lines farther out, believing that to do so further encourages sprawl. Yet refusing to extend this vital infrastructure merely means more septic systems, which are largely unregulated. EPA has taken small steps to look at the problem but has developed no plan of action. In 2005, Ben Grumbles, the EPA assistant administrator for water, said failing septic systems are the second leading cause of groundwater contamination and are responsible for 32 percent of the shellfish bed closures. The agency also estimates that up to 20 percent of decentralized systems nationwide do not properly treat wastewater because of inadequate site location, poor design, or lack of maintenance. While septic systems were once the province of rural areas, their use is now more widespread, affecting about 20 percent of the housing stock and serving about 70 million people. That the U.S. population has reached the 300 million mark and is expected to increase by another 100 million by 2040 further heightens the challenge posed by decentralized systems.

A. Overarching Themes

- People should not utilize septic/decentralized systems where alternatives are feasible. Participants questioned whether the cost of extending collection systems to outlying areas often resulted in the addition of septic/decentralized systems instead.
- Nearly ¼ of the U.S. population are currently using decentralized systems. With the population expected to grow by 100 million over the next three decades, challenges posed by mismanaged decentralized systems will only increase.
- Another concern is the negative consumptive impact of septic/decentralized systems. These systems use water that is not accessible in the watershed for a significant amount of time.
- Are septic systems a sustainable alternative? Once they are in use, how can one guarantee appropriate management over the long term?
- Even properly operating septic/decentralized systems have the potential to impact groundwater quality.
- Source water protection concerns may drive this issue.

B. Outreach and Education

- Taking a position on this issue could improve relationships with environmental activist groups on other issues.
- The clean water community needs to recognize that the septic community is not a “green” community; it is largely in isolated developments where residents are vehicle dependent.
- We are not the enemy of decentralized systems, though their supporters believe we are. We must work together for solutions.

C. Advocacy

- The clean water community should consider whether a performance standard for septic systems should be developed and implemented. NACWA should advocate for improved/advanced performing systems and new technologies.
- Small systems and septic/decentralized systems should not be exempted from nutrient standards. They must be part of the nutrient control efforts, or smaller decentralized systems will be used to avoid costly regulations instead of expanding POTWs.
- NACWA should help support municipalities in their advocacy efforts where state legislative efforts such as those in Florida are seeking to make septic an approved alternative to public sewer systems.
- NACWA should ensure that POTWs are not required to take control of or responsibility for septic/decentralized systems. If POTWs do take responsibility for them, they should get credit for these flows in their wasteload allocations.
- NACWA should respond to EPA, which has come out as an advocate of decentralized systems. We need to be a voice of reason pointing out that these systems have their downsides as well.

D. Research and Development

- Research is needed to determine and quantify the water quality impacts from septic/decentralized systems.

VIII. Other Issues

The following matters were identified at the end of the discussion when participants were asked if additional issues not on the agenda deserved attention.

- Climate change/global warming
- Better collaboration on data collection among the U.S. Geologic Survey, states and utilities, among others. Also, data collection should focus on key issues like wet weather to ensure limited resources are used efficiently.
- Work on AWWA and other water sector organization relations. We need common ground on funding and broader involvement. We should seek industry alignment to address these issues together.
- Use attainability analyses (UAAs) and water quality standards review. The system doesn't work. We need to improve the methods for determining the appropriate level of investment in an urban stream. A higher-order issue may be driving many of these issues.
- Lots of data is generated, but it is not being put to use efficiently, in a coordinated fashion.
- Public involvement/engagement – what's NACWA's role in ensuring this?
- The watershed concept: to achieve success we need to keep working on financial capability/affordability issues.
- Air deposition impacts on the watershed needs to be part of the equation.

IX. Conclusion

NACWA and the CWA have matured together. At the time of its 35th anniversary, the Association acknowledged the need to move away from “business as usual” and demonstrate a renewed and reinvigorated clear commitment to clean water. The “prize” we pursued was, and is, clean water – and it was with our eyes on that “prize” that the Association became the National Association of Clean Water Agencies. NACWA's 35th anniversary gave the Association the opportunity to refine and refocus its direction, just as the 35th anniversary of the CWA offers a unique opportunity to define our clean water future.

This report identifies numerous opportunities, including opportunities for NACWA to expand and diversify its advocacy, opportunities for NACWA to work together with our traditional partners and new entities, and even opportunities for key water sector organizations other than NACWA to expand and diversify their education, outreach and research agendas.

While the positions taken and recommendations made were many and diverse, one message emerged as a common thread. NACWA's members view themselves as environmental leaders, and want to assume that role fully in the future. No longer are they willing to wait for the guidance

they seek from Washington. They are empowered and accept the prominent role they can play in shaping federal policy in Washington and in leading by example at home.

Without a doubt, NACWA will continue to pursue increased federal funding for clean water, a peak wet weather flow policy, a thoughtful approach to SSOs, and numerous other critical initiatives in the water quality, legal, security, and biosolids arenas. In recent months the Association has also begun to build new alliances with Ducks Unlimited on constructed wetlands, with the Theodore Roosevelt Conservation Partnership (TRCP) on farm bill issues, and with the Natural Resources Defense Council and EPA's Office of Water and Office of Enforcement & Compliance Assurance on a statement of support for green infrastructure in communities with CSOs, SSOs and/or stormwater.

For NACWA, the future is green as we work to fulfill our core purpose – to be the leading advocate for responsible national policies that advance clean water and a healthy environment. In the coming weeks, the NACWA Board will consider a proposal to focus the theme of the 2007 Summer Conference on green infrastructure and the Association will continue to strengthen its strategic alliances with WEF and WERF. NACWA's Strategic Plan, adopted in September 2004, will receive a thorough review with an eye toward incorporating many of the concepts discussed in this *Report*.

Clearly, there is a need for an integrated approach to water quality – an integrated clean water action plan of sorts, that would tear down walls and lay the foundation for a more comprehensive national strategy for clean and safe water. The many members of NACWA who met in Kansas City in December 2006 appear ready to meet this challenge.