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The Role of Cost, Scale, and Property Attributes in Landowner Choice of Stormwater Management Option.

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1 The Role of Cost, Scale, and Property Attributes in Landowner Choice of Stormwater Management
2 Option.

3
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5 May 25, 2020
6

7 **Abstract:**

8
9 Cities throughout the world are experimenting with Low Impact Development (LID)
10 strategies to replace ecosystem services degraded by urbanization. Stormwater management may need both
11 centralized/publicly-managed infrastructure and decentralized provision by landowners. For landowners to
12 participate in these programs they will need some latitude in the choice of techniques and siting. However,
13 these landowner choices will affect the bundle of ecosystem services provided (such as infiltration,
14 aesthetics, pollution filtering, and others) as well as their spatial distribution. We studied the Santa Monica
15 (CA) stormwater regulations that require stormwater management on a large portion of development and
16 redevelopment but allow a significant degree of landowner choice over the method of rainwater
17 management. We use a novel dataset to investigate both the cost of rainwater best management practices
18 (BMPs) and landowner choice of rainwater BMP. We find strong evidence of economies of scale in capital
19 costs for the smaller size ranges of the BMPs in our data, and that property factors such as land use and
20 overall redevelopment project cost affect rainwater BMP costs. In addition, our results are consistent with
21 the hypothesis that property factors such as building density and land value are important factors in the
22 landowner's choice of rainwater management option.
23

24
25 Keywords: low impact development; stormwater; economies of scale; ecosystem services.
26
27

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28 **1. Introduction**

29 Impervious hard surfaces in urban areas generate more runoff and pollution problems than the
30 natural surfaces that they replace (NRC 2009). The National Research Council (2009) states
31 “urban stormwater is listed as the primary source of all impairments for 13 percent of all rivers,
32 18 percent of lakes, and 32 percent of all estuaries.” Stormwater management is also one of the
33 most pervasive regulations that affect landscapes. There are approximately a half-million
34 regulated entities in the EPA stormwater regulation program (MS4), including almost all
35 separate sewer systems in urban areas. The problem is not limited to the United States. The urban
36 population worldwide is expected to grow to 7 billion people by 2050 (United Nations 2018).
37 Local policymakers worldwide need insights into the ways that stormwater management can
38 provide ecosystem services while cost-effectively reducing the water quality and quantity
39 problems that result from urbanization.

40
41 Stormwater management mitigates the damage done to water bodies through urban development
42 (National Research Council, 2009; Zhang and Schilling, 2006). Extreme precipitation due to
43 climate change is likely to exacerbate this damage (LARC, 2016). In addition, stormwater
44 management is a key climate adaptation strategy for many urban areas where climate forecasts
45 predict increased flooding and/or drought (Cutter 2018). Dhakal and Chevalier (2016) show that
46 to deal with these new challenges urban stormwater governance will need to control runoff from
47 private parcels and involve landowners in decision-making. Roy et al. (2008) discuss the need
48 for better cost data on decentralized stormwater management tools. This paper analyzes the
49 costs of small-scale decentralized stormwater management. Then, it uses the estimates of cost

50 curves from this analysis to examine landowners' decisions on: (1) whether to include a
51 stormwater management device on their property or pay an in-lieu fee; and (2) if they include a
52 stormwater management device, what type to include. We use a unique database of stormwater
53 management devices and costs to determine role costs and economies of scale have on
54 stormwater management provision at the property-level. To our knowledge, ours (e.g. from Santa
55 Monica) is the only large dataset on smaller, decentralized BMPs.

56

57 One key aspect of socially-optimal stormwater management is finding the right location on the
58 continuum from centralization to decentralization. If stormwater management has significant
59 economies of scale, that factor will push toward provision by a few large-scale systems.

60 Decentralized provision often offers advantages in flexibility and adaptability. If there are few
61 economies of scale, those factors may outweigh the cost advantages of large centralized systems.
62 This is the only paper we know of that analyzes economies of scales for the major types of
63 property-level rainwater management technologies.

64

65 A second key question for stormwater management is the optimal mix of ecosystem services
66 (such as infiltration, flood reduction, pollution filtering, and others.) Decentralized provision by
67 landowners means some loss of control over the mix of ecosystem services provision. The best
68 mix of these services likely changes from place to place as well as over time and there is no
69 guarantee that decentralized landowner provision will arrive at the socially optimal mix of
70 provision. The type of stormwater ecosystem service could matter a great deal to environmental
71 outcomes, total benefits of stormwater regulation, and municipal policy (see Kandalu 2014).

72

73 This paper analyzes the mix of provision resulting from a system in which a governmental
74 regulatory body sets the goal (such as a specific rainwater volume reduction) but largely leaves
75 the choice of rainwater management technique (rainwater is the technical term for precipitation
76 that falls on a property, once it leaves the property it becomes stormwater) to individual
77 landowners. The simplest hypothesis is that landowners choose the least expensive rainwater
78 BMP for their mitigation requirement. In order to test this idea, we first model the cost capacity
79 curve to assess economies of scale for each of three categories of BMP using a variety of
80 regression techniques and specifications. The costs of large-scale regional BMPs have been
81 investigated in a few papers (Weiss 2007, Nobles 2012). However, many cities, like Santa
82 Monica, are now requiring or incentivizing small-scale BMPs to treat stormwater flow from a
83 single property.

84

85 We then build a multinomial logit model of rainwater BMP choice to examine the factors that
86 influence landowners' choices over whether to install a BMP or pay an in-lieu fee and, if they
87 install a BMP, what type to install. Our model provides insight for policymakers on what BMP
88 choices might be in their particular area. It also sheds light on how landowner choice of BMP is
89 likely to affect the bundle of ecosystem services provided by rainwater treatment requirements.
90 Cadavid and Ando (2013) and Ando et al. (2020) show that the different ecosystem services
91 generated by rainwater BMPs have widely varying social value (as measured by aggregate
92 willingness to pay). Therefore, a key part of the design of stormwater regulations that have
93 significant landowner choice is to understand which BMPs landowners are likely to pick. The
94 contrast between the capital cost of the BMPs and BMP choice allows us to examine whether

95 opportunity costs such as land or site design are important components of the landowner's
96 decision.

97

98 We begin by laying out the choices cities face when deciding on stormwater management from
99 among ecosystem services/treatment options known as best management practices (BMPs).

100 Then, we discuss the particular technologies that are commonly used to manage stormwater
101 runoff in our study city, Santa Monica, California. Next, we discuss how we assembled the data
102 used in the analysis. Then we discuss the theoretical factors behind BMP cost and analyze the
103 cost and economies of scale for the common stormwater BMP categories. We examine the
104 determinants of BMP category choice, including the choice to use an in-lieu fee (one-time
105 payment to City for a larger BMP system in place of the landowner, in public land, see Below).
106 Finally, we discuss the implications for stormwater management and decentralized provision of
107 ecosystem services generally.

108

109 **2. Key Design Choices for Municipal Stormwater Managers**

110 Policymakers have a menu of options (BMPs) to manage stormwater or wet weather runoff
111 before it reaches natural water bodies. The traditional avenue for managing stormwater has been
112 large centralized systems that prevent floods by rapidly conveying runoff to water bodies
113 (Brabec 2009.) However, these systems can aggravate both pollution and streambed degradation
114 for receiving water bodies. Other centralized systems use approaches such as detention ponds,
115 infiltration, or filtration to treat stormwater on a neighborhood or regional scale. In these
116 systems, policymakers directly choose the type of BMPs and therefore the basket of ecological
117 services provided by those BMPs.

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Decentralized strategies operating at the individual property level often go under the umbrella of low impact development (LID) strategies and green infrastructure (GI) systems. Examples are infiltration pits, permeable pavement, rain tanks or bioswales (U.S. Environmental Protection Agency, 2000). Typically, LID approaches are instituted for newly developed or redeveloped properties. Cities usually give landowners a performance standard for BMPs but leave the choice of BMPs up to the developer. However, different cities may offer different criteria for BMPs, such as managing a given volume of rainwater of a criterion rain event, a water quality criterion, a volume criterion, or some combination. Cities may also directly set the allowable LID BMPs through regulations governing which types of BMPs can be installed to meet the regulatory criteria.

Often, cities that pursue LID approaches also allow an opt out in the form of an in-lieu fee (Cutter and Hodge 2012). These one-time fees allow landowners to pay their way out of some or all of the LID requirement; the revenue from these fees can be used by the city to pay for more centralized approaches where the LID approaches do not meet the policy objectives.

The in-lieu fee serves as a critical, government-controlled balance mechanism between the decentralized LID approach and more centralized approaches. If the fee is set high then landowners will mostly install their own BMPs, and there will not be a great deal of revenue for centralized BMPs. If it is set lower, there will be fewer private LIDs installed, but more revenue for centralized approaches.

141 Centralized approaches have the advantage that policymakers can directly control what types of
142 BMPs are installed and where they are placed. This gives policymakers more direct control over
143 environmental outcomes. In addition, there are likely to be economies of scale in BMP costs, as
144 found in Weiss (2011). However, a key disadvantage is that all the funding must come from the
145 public purse. Also, centralized BMPs usually imply a real or opportunity cost of dedicating some
146 land to the BMP. In areas with high land value, this cost can be significant.

147

148 **3. BMP Options in Santa Monica**

149 Santa Monica (CA) is a dense (about 11,000 people/square mile) city with expensive real estate.
150 Therefore, it is difficult to devote valuable land exclusively to stormwater management; partly
151 because of this constraint, the city has implemented policies to require LID strategies and GI
152 systems on private land for new and redeveloped properties. It is an early adopter of LID policy
153 and aims to be self-sufficient on water resources in this new decade (City of Santa Monica
154 communication, 2020). Over the past 20 years, the city has been effective in approving LID
155 projects on over 2,000 properties.

156

157 Stormwater management in Santa Monica allows three broad types of ecosystem service
158 provision at the onsite parcel or property level, e.g. micro-watershed level, in rainwater
159 management:

- 160 • harvest and return the water for direct *use*, for example by cisterns or rain barrels;
- 161 • *infiltrate* the water to groundwater (passive use);
- 162 • *filter* out pollutants and return the water to the storm drain system.

163

164 Each of these BMPs has different water management and environmental consequences:

- 165 • *Use* BMPs reduce stormwater pollution to receiving water bodies while augmenting
166 immediate local water supply (water quality and quantity management).
- 167 • *Infiltration* augments groundwater and thus longer-term water storage, as well as removing
168 pollutants (water quality and quantity management).
- 169 • *Filtration* removes some pollutants but releases water to the storm drain system (water
170 quality only management).

171

172 In Santa Monica, rainwater BMPs are required for most newly developed and redeveloped
173 properties (City of Santa Monica Urban Watershed Program 2017). Santa Monica also has an in-
174 lieu fee option where, under some circumstances, landowners can contribute to funding for large-
175 scale, city-run stormwater management in lieu of constructing their own BMPs.

176

177 Our cost analysis measures are derived from Santa Monica's requirements: 3/4 inches of
178 mitigation volume for each square foot of impervious area (1.905 cm per 0.093 m²). Santa
179 Monica uses standardized conversion factors to estimate void volume from gross volume for the
180 different BMP types. Void volume must equal or exceed the required mitigation volume in order
181 to meet the BMP requirements. (City of Santa Monica Urban Watershed Program 2017).

182

183 By far the most popular BMP option in Santa Monica is *infiltration*. The simplest technology is
184 a gravel bed that collect rainwater runoff and then holds it as it gradually infiltrates into the soil.
185 Quite a few varieties of this technology all operate on this principle of storing water for gradual
186 infiltration. These technologies work best with permeable soil that infiltrates water quickly, and

187 where the groundwater level is deep enough not to promote flooding. Cutter et al. (2018) find
188 that municipal climate adaptation plans in Mediterranean climate zone regions (like Santa
189 Monica) often emphasize infiltration because it has the potential to add to water supplies as well
190 as mitigate stormwater pollution and flooding.

191

192 The next most important BMP category is *use* devices such as cisterns and rain barrels that hold
193 water until it is used in the home or for irrigation. Their benefit is in direct provision of non-
194 potable water, rather than indirect water supply through pumping out groundwater, with
195 associated costs.

196

197 **Filtration** systems pass rainwater through a variety of media that remove pollutants in the
198 rainwater or stormwater, or convert them through chemical and/or mechanical processes into
199 harmless byproducts. These can range from low-tech options that filter this water through sand
200 and other soil media to higher-tech engineered devices. Bioswales are a popular filtration option:
201 water is routed through vegetation that filters out pollutants and also often provides interesting
202 aesthetics. Other filtering systems only work to remove solids, such as trash, from runoff. There
203 is a good deal of overlap in choice and implementation of these two technologies; we combine
204 them in our cost analysis.

205

206 The different technologies tend to be used in different capacity ranges. Landowners choose use
207 BMPs for fairly small systems (median 4.5 cm). They choose non-biofilter filters for larger
208 systems (18 cm median). They use infiltration systems along most of the size range, except the
209 largest systems (above the 75th percentile), which are mostly non-biofilter filters. Table 1 details

210 show the percent of a given BMP type that fall into the overall capacity quartile (i.e. 69% of non-
211 biofilter filters are found in the top overall quartile.)

212

213

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BMP Type	Quartile			
	1 st	2 nd	3 rd	4 th
Filter: Biofilter	40.38	40.38	9.62	9.62
Filter: Non-Biofilter	7.41	11.11	12.96	68.52
Infiltration: Other	17.88	22.92	30.63	28.57
Infiltration: Permeable Pavement	40.00	40.00	0.00	20.00
Use	54.09	34.16	6.05	5.69

216

Table 1

217

BMP Types by Quartile of Overall BMP Capacity
(% of type total)

218

219

220

We focus on infiltration systems, since we have enough data on Santa Monica’s installations to

221

closely examine their cost-capacity curve; we hope our analysis might inform decision-making in

222

the context of worldwide interest.

223

4. Data

225

The data compiled for this study primarily relies on inflation-adjusted BMP construction cost

226

and BMP description information from Santa Monica for privately built rainwater BMPs. The

227

data ranges over a 13-year period (2006-2018) and contains information regarding the BMP

228

choices for every new or re-development project larger than 500 square feet since 2006. For

229

more complete analysis, we added information from the Los Angeles County local property-roll

230

data, including: size of property (when missing from original data), assessed land value, and built

231

square footage. (see Appendix B for an additional data note.)

232

233 The Santa Monica data includes latitude and longitude. Fig. 1 shows a map of the Santa Monica
234 watershed with the spatial distribution of the properties with installed BMPs overlaid. Table 2
235 shows the summary statistics for the data we use in this paper.
236



237
238
239

Fig. 1. BMP Locations in Santa Monica.

Variable	Obs	Mean	Std. Dev.	Min	Max
BMP Total Cost (\$)	1,831	14,627.17	8,7081.13	4.00	3.47e+06
Capacity (m ³)	1,828	13.02	53.91	0.03	1,234.53
Cost per m ³	1,828	1,365.68	2,043.62	0.47	40,139.11
Cost (\$10 ⁵)	1,800	14.60	54.09	0.00	1,404.22
Fiscal Year	1,831	2,010.29	5.17	1,996.00	2,018.00
ParcelArea (ft ²)	1,831	10,770.97	20,338.18	580.00	319,002.34
Assessed Land Value per m ²	1,688	14.64	14.42	0.40	220.28
Floor Area Ratio	1,666	0.38	0.57	0.00	14.41
Mitigation Requirement (m ³)	1,815	11.19	56.65	0.00	2,146.42
Project Cost per m ²	1,800	11.10	20.36	0.00	386.40
Property Area (m ²)	1,831	1000.66	1,889.48	53.88	29,636.29
Project Cost per m ²	1,800	0.01	0.02	0.00	0.45

Table 2
Descriptive Statistics

240

241 **5. Results Rainwater BMP Costs**

242 We begin by examining the costs and size for the major BMP categories discussed above

243 (filtration, infiltration, use). The different capacity ranges of BMPs could indicate that they may

244 have different cost-capacity curves, so we decided to first model a relatively homogeneous

245 category. Infiltration is the most common BMP, and has the sample size to examine functional

246 form and specification; so we analyzed at length the cost-capacity curve for infiltration BMPs

247 before examining whether cost-capacity curves are similar for the other BMP types. We used

248 lowess regression as a nonparametric method to capture the cost curves for infiltration BMPs and

249 then proceeded to examine parametric specifications using general linear regression modeling.

250 In these regressions, total construction cost of the BMP is the dependent variable. Next, we

251 modeled the results' robustness to additional controls. Then, we examined whether the results

252 would be similar if we used cost/gallon of capacity as the dependent variable.

253

254 5.1 Broad Comparison
 255

	Mean \$/m ³	Mean BMP Cost	Mean BMP Capacity	Median BMP Capacity	N
Filter: Biofilter	973.013	4,959.832	7.009	5.097	52
Filter: Non-Biofilter	2,014.956	9,9872.31	54.625	18.122	54
Infiltration: Other	1,351.447	11,858.39	11.985	7.079	1,309
Infiltration: Permeable Paving	2,803.47	21,815.85	7.15	5.238	10
Use	817.03	5,911.162	9.004	4.53	281

256 **Table 3**
 257 BMP Cost and Capacity by Category
 258

259 Table 3 shows a wide range in both cost and size of the BMPs across the three major
 260 categories as well as some subcategories. Biofilters, use and permeable paving (an infiltration
 261 subcategory) BMPs cluster around the smaller BMP capacities. Infiltration BMPs other than
 262 permeable pavement and in-lieu fees are in the middle of average capacity and also have a wide
 263 range. Landowners choose filter BMPs to meet relatively large capacity requirements—the 25th
 264 percentile for filter BMPs is larger than the median for all other categories (Table 1). These
 265 different size ranges for the different BMP technologies indicate that either economies of scale or
 266 other property-size-dependent characteristics influence BMP choice.

267
 268 Table 3 shows that mean per-capacity costs vary by a factor of three and median costs by
 269 more than 12 across these subcategories. These cost differences imply that the opportunity costs
 270 of BMPs, such as limitations their construction imposes on the development of the property,
 271 might be as important as the capital costs to the choice of BMP. For instance, Table 3 shows the
 272 average per-capacity cost of permeable paving is about 50% higher than the next most costly
 273 BMP. One possible explanation for these choices is that some BMPs with higher unit use less
 274 land. Another explanation is that different types of BMPs have different economies of scale, and

275 therefore projects with smaller required mitigation have a different cost-minimizing choice than
276 larger projects. A final possibility is that the particular aesthetic requirements of different sites
277 are most compatible with different BMP types.

278

279 5.2 Factors influencing BMP cost.

280 The size of the BMP is likely to be the single largest factor in the BMP cost. In addition,
281 the BMP type (within the categories) may influence costs even after controlling for the capacity
282 of the BMP. The overall cost of the project is likely to be positively correlated with BMP costs.
283 A bigger, more expensive project is likely to have aesthetic demands and lot-use demands that
284 require a more complex and expensive approach to stormwater management. Different land uses
285 may have different priorities for BMPs that result in different costs. In particular, commercial
286 properties may face different demands and non-stormwater regulations than residential properties
287 and these demands may influence the opportunity cost of land. Therefore, we controlled for land
288 use type in the analysis. In Appendix A, we also examine other property characteristics—such
289 as lot area, building density, and assessed value per square foot—that might plausibly be
290 associated with BMP costs.

291

292 5.3 Infiltration BMP Results

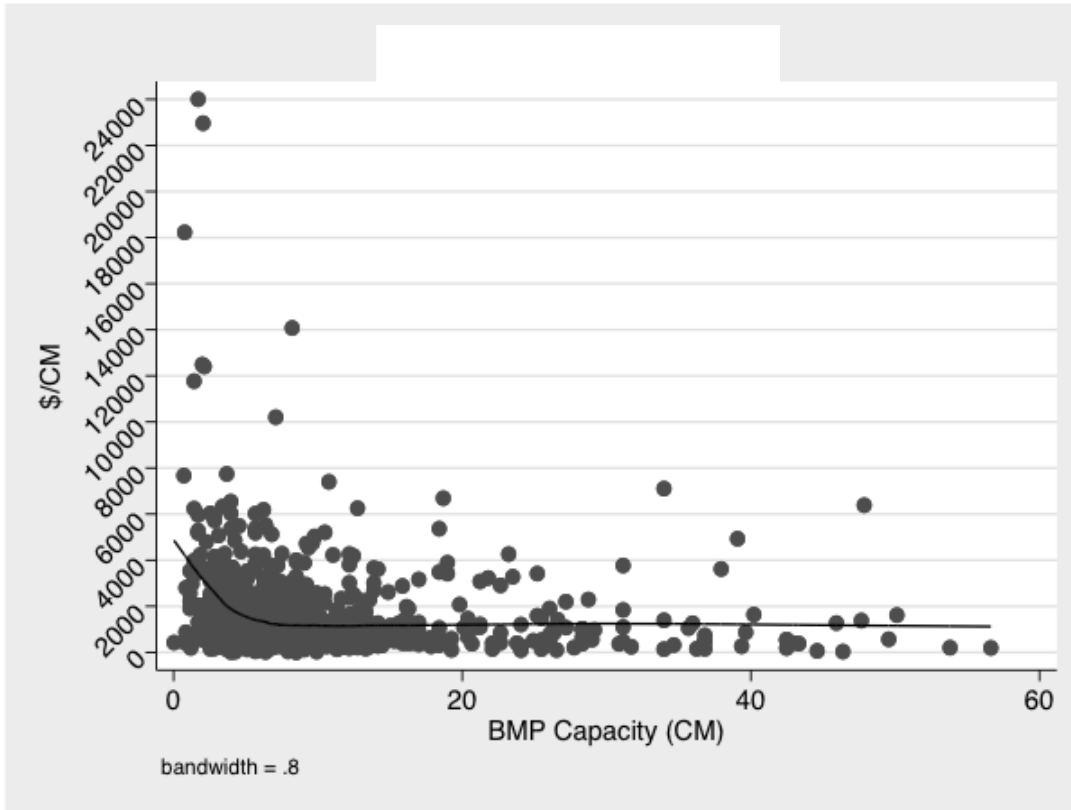
293 The lowess regression with cost per gallon as the dependent variable shows an initial steep
294 decline in cost per capacity (Fig. 2). At the 25th percentile of capacity for infiltration BMPs the
295 predicted cost per gallon is down to \$1,438 per cubic meter. The predicted cost per gallon falls
296 slightly more to about \$1,222 per cubic meter at the 50th percentile and then stays near that cost
297 per cubic meter for the rest of the sample. These results suggest that economies of scale mainly

298 exist at the low end of the capacity range. Equally, the figure shows that there is a wide range of
299 costs around the average for which we needed to account in order to obtain good estimates.

300

301

302



303

304 **Fig. 2.** Lowess Smoothed Average Cost Per CM (Infiltration BMPs).

305

306 *Costs and Economies of Scale*

307 The lowess regression (Figure 2) indicates that a linear specification is unlikely to capture the
308 cost curve well. The relationship between capacity and cost appears nonlinear. This suggests that
309 either a log-linear or log-log (in m^3 capacity, the main independent variable) could capture this
310 non-linearity. (In addition, unreported Box-Cox flexible-form models indicate that log-log is the
311 best fit.)

312

313 Table 4 shows five specifications for infiltration BMP costs. Across all specifications the
 314 coefficient on the capacity measure is highly significant at any conventional significance level.
 315 For the base specification with only capacity, a unit (cubic meter) increase is associated with
 316 6.6% increase in total cost. When we include additional controls, this falls to about a 5% increase
 317 in total cost for a unit increase. The log-log specification (Column 5) indicates a 10% increase in
 318 capacity leads to a 3.5% increase in cost. These are similar results, a 10% increase in capacity at
 319 the mean capacity implies an approximately 0.7 m³ increase, which would lead to about a 3.4 %
 320 increase in specification three.

321

	(1)	(2)	(3)	(4)	(5)
Independent Variable= Log(BMP Cost)					
Capacity (m ³)	0.066*** (0.004)	0.058*** (0.005)	0.049*** (0.005)	0.042*** (0.005)	
Log Capacity (m ³)					0.349*** (0.050)
Log Project Cost			0.195*** (0.025)	0.192*** (0.028)	0.214*** (0.026)
Observations	1,298	1,298	1,298	1,298	1,298
R ² (LOOCV)	0.139	0.170	0.221	0.264	0.267
AIC	26,424.183	26,363.971	26,370.096	26,296.767	26,338.776
BIC	26,434.520	26,389.814	26,385.601	26,358.790	26,369.787
Year Trend	no	yes	no	yes	yes
Land Use Dummies	no	yes	no	yes	yes
BMP Dummies	no	no	no	yes	no

Standard errors are in parentheses

*** $p < .01$, ** $p < .05$, * $p < .1$

322

Table 4

323

Cost Curves for Infiltration BMPs

324

325 The coefficient on the log cost of the overall project is also significant at any conventional
 326 significance levels. The estimated elasticity of project cost is about 0.19 across specifications.

327 The BMP cost averages <2% of the project cost, so it is unlikely the BMP construction has a

328 large effect on project cost (reverse causality). Instead, it appears the overall costliness of the
329 project, or a variable correlated with it, is strongly associated with the cost of the BMP, even
330 after controlling for capacity.

331

332 Additionally, the land use of the property is strongly associated with the BMP cost. The
333 coefficients on the two residential classes are negative and significant at any conventional
334 significance level. Their value is about -0.5, implying that residential properties are associated
335 with almost a 40% reduction in BMP cost relative to commercial/industrial properties. One
336 possibility is that residential properties choose less-expensive types of BMPs, but the coefficients
337 on property type are negative and significant even when the BMP type is included as a fixed
338 effect; also the BIC and LOOCV scores only change slightly when including BMP-type fixed
339 effects. These results indicate that the specific type of BMP within our infiltration category is not
340 important for predicting costs. The coefficients on the BMP fixed effects are generally
341 insignificant if land-use controls are included (including unreported regressions with different
342 combinations of controls). Appendix A contains several robustness tests of the results including
343 examining cost per m³ as the dependent variable and specifications where we included some
344 property value and density information that is only available for a portion of the sample. These
345 specifications do not change the key findings of this section.

346

347 One goal of this research is to provide a methodology to help guide cities that have or are
348 considering rainwater BMP requirements. We used the Bayesian information criterion (BIC) and
349 Akaike information criterion (AIC) as standard measures to project out-of-sample fit, and also
350 considered leave-one-out cross-validation (LOOCV). By the BIC and LOOCV criteria

351 specification four is superior. There is little difference in the LOOCV criterion between the
352 capacity and logged capacity specifications (Table 4, columns 4 and 5) with the controls in
353 specification four. More importantly, specifications two through five inclusive have similar
354 implications for economies of scale, and specification one implies only somewhat higher
355 elasticity. One interesting result is that the pseudo- R^2 from LOOCV are quite high for
356 specifications four and five. This is an R^2 for out-of-sample prediction, and it explains about
357 25% of the variation of BMP costs. The log-log specification (column 5) captures the shape of
358 the non-parametric lowess analysis somewhat better. The unit costs drop very quickly at first,
359 and then are fairly constant. This matches the shape of the lowess regression and unit costs by
360 size tabulations. Given the similar performance on information criteria and out-of-sample fit, we
361 view the log-log model as preferable and use it in our cost comparisons later in the paper.

362

363 To summarize our findings on cost and economies of scale for infiltration BMPs:

364

- 365 1. The economies of scale are largely at the low end. This implies that an LID approach
366 has a high cost per capacity for smaller properties.
- 367 2. There are significant differences in cost across land uses.
- 368 3. The log-log model performs slightly better than log-linear and matches the non-
369 parametric results better. The linear regression model performs quite poorly relative
370 to the log-linear or log-log models.

371

372

373 5.4 Costs for Filter BMPs

374 We used the same set of specifications to evaluate cost curves for costs for the other two BMP
375 categories. For filter BMPs, Table 5 shows specifications that include cost of the project, fixed
376 effects for the BMP type, an indicator for a secondary BMP, as well as capacity measure. The
377 models that control for project cost (columns 2 and 3) perform far better on AIC, BIC, and
378 LOOCV criteria than those that do not. The pseudo R^2 from LOOCV for column 2 is 0.31 so the
379 out-of-sample predictions are good. The specifications show a range of elasticities from about
380 0.35–0.50 when we control for project costs. Columns 2 and 3 have similar AIC/BIC but model
381 2 has better LOOCV performance, so specification 2 appears to be a better predictor overall and
382 is the one we use for our comparison analysis.

383

384

	(1)	(2)	(3)
Independent Variable= Log(BMP Cost)			
Log Capacity (m ³)	0.942*** (0.076)	0.343*** (0.119)	0.496*** (0.133)
Log Project Cost		0.312*** (0.108)	0.221** (0.111)
Observations	106	101	101
R ² (LOOCV)	0.180	0.308	0.240
AIC	2263.561	2097.455	2092.140
BIC	2268.888	2123.606	2120.906
BMP dummies	no	yes	yes
2nd BMP dummies	no	no	yes

Standard errors are in parentheses
 *** $p < .01$, ** $p < .05$, * $p < .1$

385
 386
 387

Table 5
 Cost Curves for Filter BMPs

388 5.5 Costs for Use BMPs

389 The use category is about 95% rain barrels and the rest cisterns. We dropped cisterns from the
 390 specifications because of the lack of data. Rain barrels do not require extensive construction or
 391 fixed costs like the other uses, so they are less likely to show economies of scale. Also, in this
 392 data, landowners usually choose rain barrels when there is no larger redevelopment project, so
 393 the BMP cost is the same as the project cost and we could not use project cost in the regressions.
 394 The models (Table 6, columns 3 and 4) with controls for secondary BMPs performed better on
 395 AIC/BIC and LOOCV criteria and the log-log model is slightly worse on AIC/BIC and better on
 396 LOOCV (0.13 compared to 0.10 out of sample R²). On these grounds we chose the log-log
 397 model as the preferred specification for our comparison analysis.

398

	(1)	(2)	(3)	(4)
	Independent Variable= Log(BMP Cost)			
Capacity (m ³)		0.334*** (0.033)	0.288*** (0.034)	
Log Capacity (m ³)	1.217*** (0.088)			1.033*** (0.093)
Observations	269	269	269	269
R ² (LOOCV)	0.092	0.043	0.104	0.127
AIC	4810.124	4809.581	4756.583	4762.914
BIC	4817.313	4816.771	4770.962	4777.293
2nd BMP dummies	no	no	yes	yes

Standard errors are in parentheses

*** $p < .01$, ** $p < .05$, * $p < .1$

399
400
401

Table 6
Cost Curves for Use BMPs

402 5.6 Cost Comparison for Best Models

403 Which type of BMP would landowners choose if capital cost were their main concern?

404 We examined this question by looking at the average cost prediction for our chosen specification

405 for each category of BMP. Figure 3 shows that use BMPs are predicted to be less expensive than

406 the other two until about the 70th percentile of BMP capacity at 8.5 m³. However, they only have

407 a large cost advantage for smaller size BMPs. Infiltration BMPs are always predicted to be less

408 expensive than filters in the range of the data, but the cost advantage narrows substantially in the

409 higher size ranges (above 50 m³, or in the 97th percentile). If landowners choose mainly on the

410 basis of capital cost we would expect to see use BMPs dominate through all but the largest 30%

411 of BMP sizes, then infiltration for the larger capacities. Of course, confidence intervals would

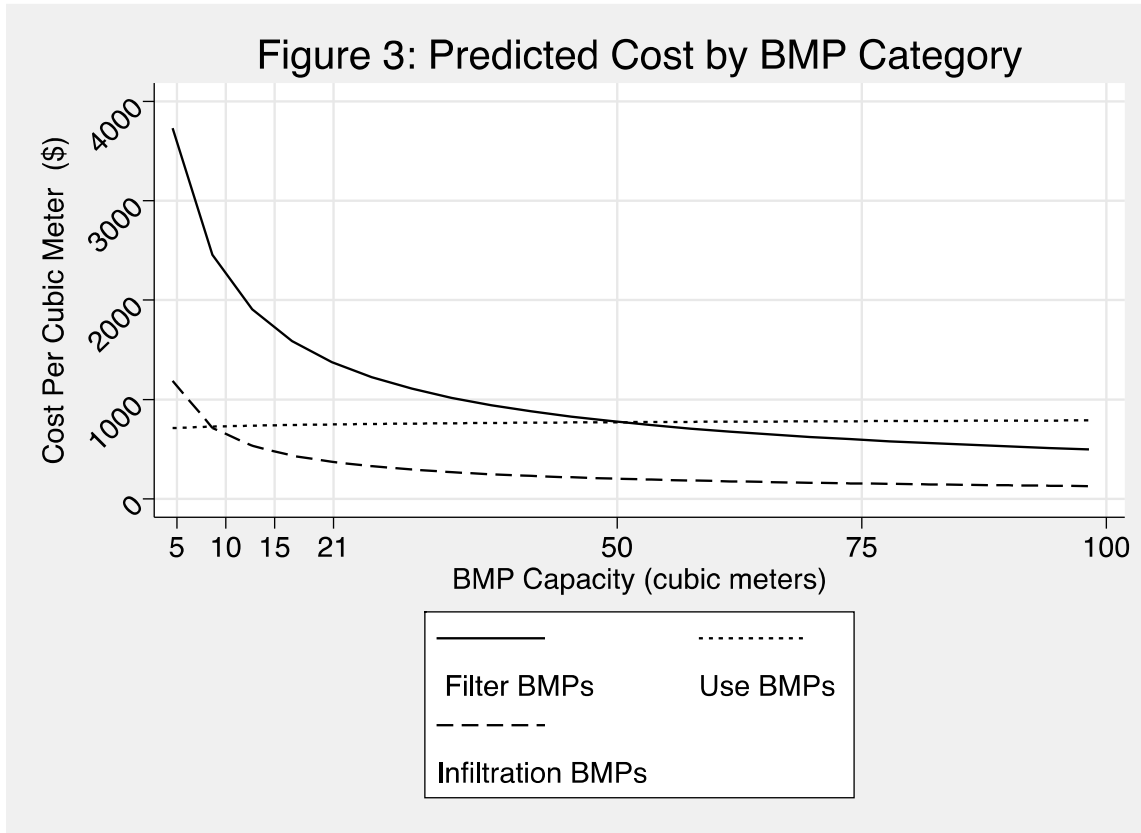
412 largely overlap, so for a particular installation any of the categories could be the least expensive.

413

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419 6. BMP Choice

420 The capital cost of BMPs is likely a significant factor in landowner choice, but opportunity costs
421 of land and additional site design compromises forced by BMPs could also be significant choice
422 factors. Landowners can also choose to pay an in-lieu fee if they meet certain conditions. These
423 include a number of environmental conditions that would make on-site BMPs difficult or
424 dangerous but also, in some circumstances, development considerations that would make
425 installing an on-site BMP difficult. We do not have data by parcel on the relevant environmental
426 conditions, so our analysis is confined to property and development characteristics.

427

428 The in-lieu fee was set at \$2010/m³ of capacity for the period in question (\$7.61/gallon). This is
429 at about the 75th percentile of reported per-gallon costs for those that constructed BMPs. Since
430 BMP capital costs are likely to be a good bit smaller than overall costs (including maintenance,
431 land and site design) the large number of BMPs with average costs higher than the in-lieu fee are
432 evidence that Santa Monica's requirements for in-lieu fee qualification are strictly enforced.
433 However, actual savings to landowners with costs above the in-lieu fee are on average small. The
434 mean savings from all landowners who would benefit if there were no qualifications for the in-
435 lieu fee is only \$175 and even the 99th percentile of savings is only about \$2100. These are small
436 fractions of overall (re)development costs. This finding suggests that the in-lieu fee choice is
437 likely more driven by land and overall development costs, and lack of annual inspection and
438 maintenance costs than the capital costs of BMPs themselves.

439

440 These savings are low because there are few properties with on-site BMPs that have both large
441 capacity requirements and high per-unit-capacity costs. Our cost estimation above shows that
442 there are large economies of scale, so that the capital costs of capacity for large installations
443 should usually be well below the in-lieu fee. The small owner-savings from universal takeup of
444 the in-lieu fee as well as our cost estimates imply that the engineering costs of BMPs is likely a
445 minor reason to use the in-lieu fee option.

446

447 Rather than capital and engineering costs, the opportunity cost of land, and overall design and
448 annual maintenance costs, are likely to be more important drivers of the in-lieu option. Assessed
449 land value per square foot is likely to be an underestimate of land value in Santa Monica. It

450 averages \$114/ft² in our sample and the 90th percentile is at \$235. A BMP design that saves even
451 the equivalent area of a single parking stall (about 160 square feet) would result in greater
452 savings than the capital cost savings we calculated. In addition, BMPs might require more
453 expensive and/or less valuable building decisions for the property (recall most BMPs are built
454 during development/redevelopment). This is not a cost we can calculate but we see a hint of
455 these costs in the BMP cost modeling. BMP costs are higher, even controlling for capacity and
456 type, for projects that are more expensive overall. A possible reason for this is that landowners
457 spend more on the BMP in order to improve the site design and profits for their redevelopment.

458
459 The above observations on in-lieu fees as well as economic theory predict that land value and
460 building density will affect in-lieu and BMP choice. We used the Floor Area Ratio (FAR) to
461 measure the development intensity and assessed land value per square foot of land to measure
462 land value. Next, the intensity of the development or redevelopment may affect the choice of
463 BMP because more intensely developed sites will have a harder time fitting BMPs into the site
464 design. We measured this intensity of development through the cost of the redevelopment project
465 per square foot of property area. There has been technical progress in BMPs over the time
466 period, so we used a year trend to capture technology and other trends (initially we used year
467 fixed effects, but a year trend had better AIC/BIC scores.) Finally, residential and commercial
468 properties have different design and aesthetic preferences, so we included land use indicators.

469

470 **BMP Category Choice Results**

471 We used a multinomial logistic regression (Table 7) for the key choices (filtering, infiltration,
472 use, in-lieu fee). Infiltration is the base category. The mitigation requirement coefficient is

473 negative, statistically significant at the 1% level and economically large for the use BMP
474 category. This coefficient is small and statistically insignificant for the other two BMP
475 categories. This means that increased mitigation is associated with movement away from the use
476 category to the other categories, but not with movement between the other categories. The
477 coefficient for the single-family land use class is negative and significant for both filtering and
478 in-lieu fees. The coefficient for multifamily land use is also negative for both filtering and in-lieu
479 fees but significant only for filtering. This implies that residential landowners are less likely to
480 choose filtering or in-lieu fees, ceteris paribus. The coefficient on assessed value per square foot
481 of land is negative and significant for the use category but insignificant for the other categories.
482 The coefficient on the FAR is positive and significant for the in-lieu fee category, but
483 insignificant for the other categories. The coefficient on the project cost per area is negative and
484 significant for the filtering and use categories. This implies that the greater the intensity of the
485 overall redevelopment project the more likely the landowner will choose either infiltration or in-
486 lieu fees.

487

488

	Filtering	Use	In-Lieu-Fee
Multi-Family	-1.849*** (-3.29)	-0.0484 (-0.05)	-0.865 (-1.79)
Single Family	-2.101*** (-6.17)	-0.364 (-0.43)	-1.928*** (-4.71)
Mitigation Requirement (m ³)	0.00652 (1.60)	-0.347*** (-8.71)	0.00604 (1.11)
Assessed Land Value per m ²	-0.00774 (-0.64)	-0.0435*** (-3.52)	-0.00712 (-0.76)
Fiscal Year	0.0676* (2.43)	0.234*** (9.31)	0.372*** (9.55)
Floor Area Ratio	0.0965 (0.27)	0.604 (1.59)	0.831** (2.81)
Project Cost per m ²	-0.0916*** (-3.91)	-0.125*** (-4.63)	0.000122 (0.02)
Constant	-136.0* (-2.44)	-470.4*** (-9.29)	-749.9*** (-9.56)
Observations	1526		
<i>AIC</i>	1796.6		
<i>BIC</i>	1924.6		

Table 7
BMP Category Multinomial Logit Choice Model

489

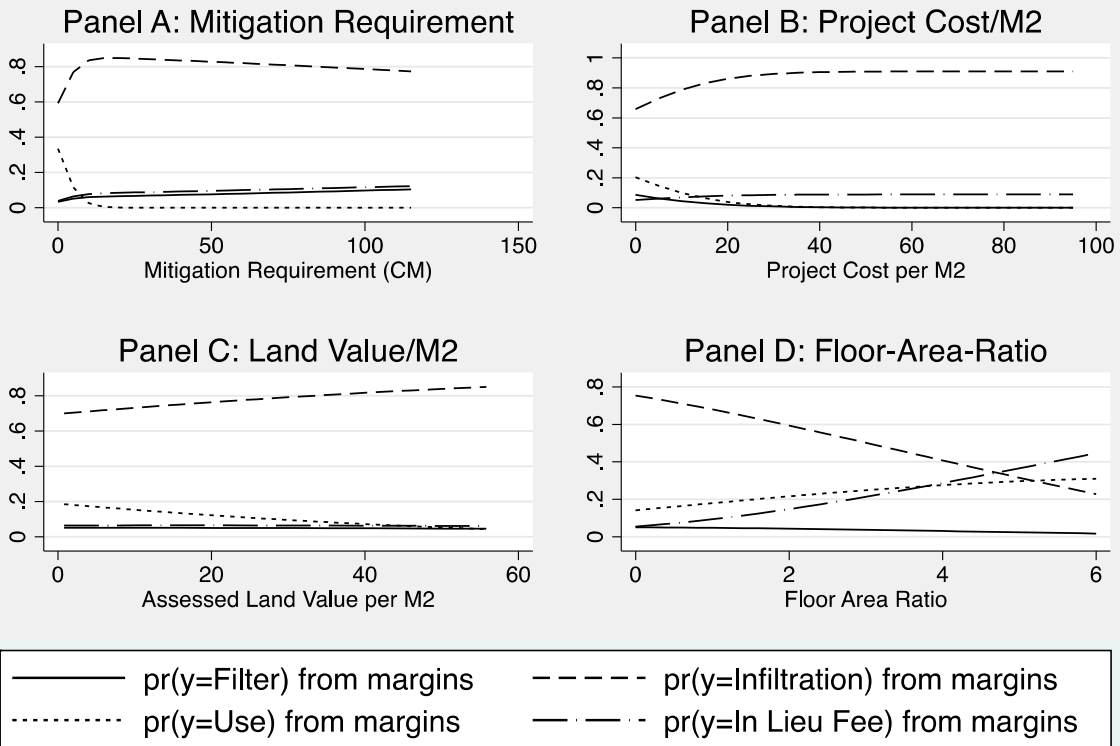
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Figure 4: Predicted BMP Choices



494

495

496 Fig. 4A shows the predicted substitution between types as the mitigation requirement grows. The

497 key feature is that infiltration BMPs increase sharply at the expense of use BMPs for the lower

498 range of mitigation requirements (this is same qualitative shift shown in Table 1). The project

499 cost per area figure shows a similar movement: as project cost increases, there is a shift from use

500 to infiltration and in-lieu fees in the lower range of project cost per square foot, but little

501 movement at the upper range. The figure for assessed land value per square foot is similar.

502 Figure 4D shows that as building density (FAR) increases it is predicted that in-lieu and filter

503 BMPs have increased probability, mainly at the expense of infiltration.

504

505

506 **7. Discussion**

507 The choice model findings are largely consistent with the findings about capital costs. We found
508 large economies of scale in infiltration BMPs at the low size range. This is reflected in the fast
509 shift away from use to infiltration in the low mitigation range in figure 4A. However, our capital
510 cost modeling indicates that use BMPs are cheaper than infiltration until capacities are quite
511 large. The choice model findings indicate that infiltration must have some other advantages in
512 the size range where the cost difference is not too large. Also, we found that filter costs converge
513 towards infiltration costs in the largest size ranges. The choice model predicts substitution
514 toward filters and fees in the large ranges. The figure shows a large percentage increase for
515 filters, though infiltration remains the dominant choice. During the period covered by our data,
516 landowners were aware that infiltration technologies were familiar to and favored by city staff.
517 When costs are close, which is what our modeling shows, it's not surprising that infiltration
518 dominates landowner choice.

519
520 If costs and other factors in Santa Monica are proportional to those in other areas, other cities can
521 expect infiltration BMPs to dominate over much of the size range. Infiltration provides a wide
522 array of ecosystem services, so it may be a fortuitous coincidence that it also has apparently low
523 capital and opportunity costs over a wide range. If, however, a city chooses to prioritize use
524 BMPs, it would need to have a different program structure that incentivizes or mandates them.

525
526 It seems that Santa Monica had good information on BMP unit costs and set the fee level so that
527 most properties would implement BMPs. There are few properties with average capital costs
528 above \$7.61/gallon. Santa Monica is dense and expensive, so placing stormwater management

529 capacity on private land makes a good deal of sense—and it appears that is what the city aims to
530 do. The only variables in our choice analysis that significantly affects fee choice is the FAR.
531 Higher FARs are predicted by our model to substantially increase fee and use choice. This is
532 consistent with our idea that more heavily developed properties would have higher opportunity
533 costs and be more likely to pay their way out of BMPs. The reason for the increase in use BMPs
534 is not as clear. However, use BMPs can be placed aboveground instead of taking up land area
535 and therefore might have lower opportunity costs as well. Santa Monica also only allowed the
536 fee opt-out under certain environmental conditions (such as high groundwater), which we don't
537 have the information to model directly. It is likely that fee use would be higher without these
538 limits.

539
540 The implication of this finding on FAR for stormwater and ecosystem services is clear
541 (assuming, of course, a causal relationship). Our analysis identifies the key factor in fee take up
542 as density of development. The other factors we could model did not have a huge marginal effect
543 on predicted fee choice. Areas with higher density development than Santa Monica can expect
544 higher demand for in-lieu fees, and lower-density areas less demand. Across a larger city than
545 Santa Monica this will have a large effect on where stormwater management ecosystem service
546 provision occurs. City managers will need to account for this pattern if they see a need for
547 stormwater management in more built-up areas of the city.

548
549 Another factor the modeling predicts will affect the spatial pattern of BMP and in-lieu fee choice
550 is land use. We examine the predictions for BMP choice by land use at the median requirement
551 capacity in Table 8. Commercial and industrial properties are predicted to choose infiltration

552 much less and filtering and in lieu fees more than single-family properties. Multifamily
 553 properties are in between these two use classes. This is not solely because of the different
 554 development intensity—the same qualitative results hold if we fix the FAR to a constant value
 555 across land uses. This result indicates that there are differences in the propensity of property
 556 types to choose BMPs even after controlling for a number of property attributes as well as the
 557 mitigation requirement.

558
 559
 560

	Filtering	Infiltration	Use	In-Lieu Fee
Commercial/Industrial Land	0.18	0.51	0.17	0.15
Multi-family Land Use	0.04	0.64	0.23	0.09
Single family Land Use	0.03	0.72	0.21	0.04
Commercial/Industrial Land, FAR=.5	0.13	0.36	0.24	0.27
Multi-family Land Use, FAR=.5	0.03	0.47	0.32	0.18
Single family Land Use, FAR=.5	0.03	0.56	0.32	0.09

561 **Table 8**
 562 Predicted Choice Probabilities for BMP Categories
 563

564 A possible reason for these differences is that the commercial and industrial and multifamily
 565 properties are likely to have less green space on the property than a single-family property with a
 566 yard. This is more difficult in the other property types. Multifamily and commercial property
 567 types, for instance, face more stringent parking requirements that means a large percentage of the
 568 property is hardscape. Thus, they may choose the in-lieu fee instead of handling the difficulty
 569 and expense of placing a BMP into a hard surface. The implications for stormwater management
 570 are clear. If Santa Monica is similar to other areas, then areas with more multifamily and
 571 commercial properties are likely to see more demand for in-lieu fees and filter BMPs than areas
 572 that are composed of primarily single-family residences. Cities will need to take this into account

573 in deciding if they are likely to receive the mix of stormwater management ecosystem services
574 that they desire.

575

576 **8. Conclusions**

577 We investigated the decentralized provision of an ecosystem service bundle in stormwater
578 provision. We used the results of a Santa Monica, California, program that requires stormwater
579 BMPs on new and re-development, with landowners given a wide choice of BMP types—or a
580 narrowly qualified in-lieu fee option—to satisfy program requirements. Compliance and other
581 public data allowed us to examine the costs and ecosystem service choices of landowners. The
582 choice of BMPs determines the mix of ecosystem services (infiltration, water supply, pollution
583 remediation) provided by the policy. We began from the simplest hypothesis—that landowners
584 choose the BMP with the lowest engineering costs—and modeled the cost-capacity curve for
585 each of the major BMP categories (use, filters, and infiltration). Our models indicate that: (1)
586 both filters and infiltration have initially high but quickly declining unit costs; and (2) use BMPs
587 (rain barrels) have flat unit costs that are less expensive on average than use or infiltration
588 through most of the range of capacities in the data.

589

590 We then used a multinomial logit to model landowner’s choice of BMPs or in-lieu fees. We
591 found that the mitigation requirement, land use, building density, project intensity and land value
592 all are correlated with the landowners’ choices. Our modeling indicates that use BMPs are
593 significantly less expensive than other BMPs throughout a large range of capacity, but
594 landowners prefer infiltration BMPs except in the smaller capacities. Similarly, filters are always
595 more expensive, but as the cost difference narrows they are chosen in the higher size ranges.

596 This indicates that the non-capital costs of infiltration and filters are less than that of use BMPs.
597 Similarly, the choice of in-lieu fees even when it appears that another option would be less
598 expensive indicate that landowners face significant non-capital costs for these options.

599

600 Our results indicate that different land uses and building densities are associated with
601 substantially different preferences for rainwater BMPs. In particular, the results are consistent
602 with the hypothesis that non-capital costs such as opportunity costs of land and design are
603 significant factors in landowner choice of BMP or in-lieu fee. Consequently, program design
604 choices such as in-lieu fees can have a substantial impact on the mix of ecosystem services
605 provided in a decentralized system.

606

607 In this paper we offer a first cost modeling from a large dataset of property-level BMPs. Further
608 research should examine in more detail the opportunity costs of rainwater BMPs and other
609 similar technology in order to see the full cost of ecosystem service provision and how that full
610 cost affects the mix of ecosystem services provided.

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