

Frequently Asked Questions About Stormwater Monitoring

What is the Stormwater Work Group?

The Stormwater Work Group (SWG) is a diverse group of stakeholders, including federal, tribal, state and local government, business, environmental, agriculture and research interests, who have developed a regional stormwater monitoring and assessment strategy for Puget Sound at the request of the Puget Sound Partnership (Partnership) and Department of Ecology (Ecology). Within this framework, the SWG has recommended a comprehensive monitoring approach for the next National Pollutant Discharge Elimination System (NPDES) municipal stormwater permits.

What was the group's charge?

The SWG's charge was to create a comprehensive stormwater component of a regional coordinated ecosystem monitoring program. A Pollution Control Hearings Board (PCHB) ruling directed Ecology to require stormwater monitoring by all permitted jurisdictions in the next NPDES municipal stormwater permits. In 2008:

- The Partnership identified stormwater as a critical gap in ecosystem monitoring and, in the *Puget Sound Action Agenda*, directed the SWG to establish a regional stormwater monitoring program.
- Ecology's director formally requested a stormwater monitoring framework specific to the permits.

Why are the *Recommendations for Municipal Stormwater Permit Monitoring* needed?

Phase I permittees have been conducting expensive monitoring that is not delivering enough information to support better management decisions. Without a comprehensive framework for regional stormwater monitoring, the permits would likely require expensive individual monitoring programs. Priorities need to be set to provide meaningful information to improve stormwater management and control costs.

What jurisdictions are affected by the proposed stormwater monitoring requirements?

The Puget Sound region's five Phase I and 76 Phase II cities and counties in Puget Sound, the state Department of Transportation, and the ports of Tacoma and Seattle are subject to NPDES municipal stormwater permit monitoring requirements.

What are the implications for Phase I, Phase II, and non-permitted jurisdictions, and for jurisdictions located outside of Puget Sound?

All local governments in Puget Sound will benefit from the information generated by the program. Phase I and II permittees will equitably be required to pay into a collective fund to administer a regional monitoring program. Permittees and others with monitoring capacity will have the opportunity to receive funds to conduct parts of the monitoring program. Some, but not all, of the SWG's recommendations can be expanded to include and benefit permittees outside Puget Sound. Ecology is not likely to have the time or resources to fully replicate the SWG's prioritization and planning process in those areas.

What process did the SWG use in developing the plan?

Ecology allowed the SWG to use a great deal of flexibility to create the new approach to stormwater monitoring. Participants knew there would be monitoring in the next permits and did not want more of the current Phase I monitoring. The SWG spent almost two years developing a scientific framework and an implementation plan for the

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regional monitoring. The process included talking to people who have done this and succeeded elsewhere around the country, two public comment periods, and three large regional workshops.

What are the advantages to local governments of adopting this new approach?

The new framework that is proposed by the SWG will enable local jurisdictions to meet their permit requirements for stormwater monitoring in an efficient and cost-effective manner. The plan will:

- Help local governments lower current and potential monitoring costs and reduce duplication of effort by allowing them to pool resources with other local jurisdictions to perform required monitoring;
- Reduce liability by paying into a collective fund to conduct the monitoring and thereby relieving them of the responsibility to collect monitoring information themselves; and
- Facilitate successful adaptive management by providing useful information about how our management actions are doing and how we can improve our approach.

How would locals proceed in the absence of a coordinated monitoring plan for Puget Sound?

Local jurisdictions subject to the NPDES municipal stormwater permits for Puget Sound would likely have to meet all monitoring requirements in the permit on their own – an approach that many believe would be more costly and not yield information that is as useful as we would expect from a more coordinated effort.

Why is Ecology recommended as the initial administrator of the funds?

The SWG considered numerous potential entities that might serve this important role and ultimately concluded that Ecology provides the only viable option at this time because Ecology is the only entity with the administrative capacity and willingness to assume this role and responsibilities for the ~~2012-2017~~[next](#) permit. A different organization might be chosen for subsequent permits.

When does the plan go into effect?

If adopted, the proposed stormwater monitoring requirements would go into effect when the next NPDES municipal stormwater permit is issued. Most permittees are not expected to contribute funds until the second year of the permit. The second and third years of the permit are dedicated to preparing for implementation of the monitoring program, which is envisioned to be fully implemented in the fourth and fifth years of the permit.

What are the next steps?

Ecology plans to release preliminary draft permit monitoring language in April 2011 for public review and comment. Public comment on formal draft permits is expected begin in October 2011. The final permits are expected to be issued in July 2012.

What if the permit issuance is delayed?

The SWG maintains that its recommendations for coordinated stormwater monitoring should be implemented in the next municipal NPDES stormwater permits regardless of when the permits are issued.