This document presents the outcome of the work group's discussions at the March 16, 2016 meeting. At that meeting, an "advisory vote" was taken to identify which issues need the most work between meetings in order for the work group to come to a consensus or near-consensus. A formal vote on these recommendations, compromises, or alternative proposals that are developed by the caucuses between meetings, will be held at the SWG meeting on June 1, 2016 and the final recommendations will be submitted to Ecology shortly thereafter.

There are two groups of "proposed alternatives" among which work group members will choose; these are (#12) alternatives to the pay-in approach and (#15) S8.D Source Identification and Diagnostic Monitoring. The final recommendations will include all consensus recommendations and all majority recommendations with minority concerns noted. A cover letter from the SWG Chair will reflect the collective SWG members' acknowledgement of what is going well in the current permit structure and RSMP implementation. The cover letter will specifically note the improvement over past permit monitoring requirements and also reference the Pooled Resources Oversight Committee's review of Ecology as the RSMP Administrator.

For Discussion by SWG Caucuses

Recommendations for future Municipal Stormwater NPDES Permit Special Condition S8 Monitoring and Assessment requirements for funding and implementation of the Regional Stormwater Monitoring Program (RSMP) funded by permittees

The RSMP is designed to provide adaptive management feedback as to the overall effectiveness of the municipal stormwater NPDES permits and local governments' stormwater management programs in Western Washington. The RSMP leverages state and federal monitoring programs and is currently conducted by local, state, federal, and private entities managed by the RSMP Coordinator.

The portion of the RSMP implemented via current permit Condition S8.B Status and Trends Monitoring applies only to permittees located in Puget Sound; the eight permittees located in the Lower Columbia River Basin are developing recommendations for receiving water status and trends monitoring in a separate process. The two other RSMP components (S8.C Effectiveness Studies and S8.D Source Identification and Diagnostic Monitoring) apply to all permittees in western Washington.

The SWG offers Ecology the following recommendations for continuing to improve the implementation of the RSMP via permit Special Condition S8 Monitoring and Assessment:

Overall recommendations for RSMP funding and administration through the permits:

Majority work group member agreement with this recommendation on March 16. Some state and federal agency representatives were concerned about the loss of purchasing power due to inflation and known rising costs of field crews, laboratory, and analyses. Members noted that the work group made changes in this current permit cycle to adapt priorities to stay within the actual budget for RSMP status and trends monitoring and will do so again if needed in the next permit cycle:

1. Maintain the current level and allocation of funding in the current permit.

Consensus agreement at the March 16 meeting to:

2. Include funding from the new permittees for this permit cycle in the next permit at the same population-based proportional dollar amount.
3. Continue invoicing permittees in the spring of each year.
4. Continue to maintain funds for each of the RSMP components in separate accounts.
    a. Pooled funds for S8.B Status and Trends Monitoring contributed by permittees located in Puget Sound should remain focused on Puget Sound status and trends monitoring activities.
5. Continue distributing and posting RSMP quarterly budget and progress reports.
6. Continue to use the Pooled Resources Oversight Committee (PRO-Committee) to oversee RSMP expenditures and contracting decisions.
7. Increase the percentage of total budget allocated for administering the RSMP from 5% to 6% or 7%, or 1.25 FTE, as recommended by the PRO-Committee.
8. Continue to use the SWG and its technical subgroups to set priorities for expenditure of RSMP funds and to modify program details such as parameter lists and site locations.
    a. The SWG has ideas for focusing future monitoring priorities, but the RSMP findings are just beginning to come in and it is too early to make major changes to the RSMP.

Recommendations for the S8.B Status and Trends Monitoring:

Consensus agreement at the March 16 meeting:

9. It is important to maintain the integrity of the regional status and trends monitoring program. This program needs to be fully funded to ensure that we can detect regional trends.
10. If S8.B Status and Trends Monitoring "Option 2" for Puget Sound permittees is included in the next permit, it needs to be better coordinated with the RSMP than what was done for the current permit.

Majority agreement with this recommendation on March 16. Some state representatives believe the current S8.B "Option 2" language goes against the spirit and power of a regionally robust status and trends monitoring program. Local representatives expressed the importance of having a choice, even if the alternative to paying in to the RSMP is substantially more difficult and/or expensive to accomplish:

11. The permit needs to provide a strong, but not exclusive, incentive for permittees to participate in the pay-in approach as the primary means of funding the permit-driven regional status and trends monitoring program in Puget Sound receiving waters.

Several alternative proposals for allowing permittees to conduct their own status and trends monitoring in receiving waters were discussed March 16. A minority of the work group (some state and federal representatives) favored #12a below. A majority of the work group favored #12b below, with a caveat/concern from some members that the regional effort will fall apart if too many permittees select this alternative; so #11 above is crucial for #12b to work. Although no advisory vote was taken, many work group members expressed willingness to consider the new proposed recommendation #12c below as a compromise approach.

12. *The goal for the June 1 meeting is to select a majority recommendation from among these three proposed alternatives (12a, 12b, and 12c) to the RSMP pay-in requirement for S8.B in the next permit:*
    a. Do not allow an S8.B "Option 2" alternative for Puget Sound permittees as an approach to fulfilling permit requirements for the RSMP Status and Trends component.

b. Retain the current S8.B "Option 2" for Puget Sound permittees but require use of the RSMP Quality Assurance Project Plan (QAPP) to ensure the same methods, timing, and parameters at the required number of sites for the "Option 2" sampling. Integrate the S8.B "Option 2" data within the RSMP.
    i. The RSMP will absorb the cost of project management, data management, analysis and reporting on the S8.B "Option 2" data. This is a small number of permittees to subsidize.
c. Amend S8.B "Option 2" to require permittees to sample small streams sites in their WRIA's or salmon recovery areas, rather than only inside their jurisdictional boundaries, to more closely achieve the densification proposed in the *2010 Strategy* scientific framework. Require use of the RSMP QAPP and have the RSMP cover costs as per 12.b.i.

Recommendations for S8.C Effectiveness Studies:

Consensus agreement at the March 16 SWG meeting:

13. The current permits' S8.C Effectiveness Studies "Option 2" and "Option 3" alternatives should be continued in the next permit.

Recommendations for S8.D Source Identification and Diagnostic Monitoring:

Consensus agreement at the March 16 meeting:

14. We will learn from the RSMP Source Identification Information Repository (SIDIR) work that is being conducted during this permit cycle to:
    - Identify education and outreach topics and audiences,
    - Inform Illicit Discharge Detection and Elimination (IDDE) and source control effectiveness studies,
    - Prioritize regional stormwater initiatives,
    - Identify ways state and federal agencies can work to reduce sources of illicit discharges,
    - Inform the next permit S5.C and other relevant requirements,
    - Reduce permittees' duplicate record maintenance and reporting requirements, and
    - Report to councils and legislators on the value of IDDE programs.

At the March 16 SWG meeting the work group members were fairly evenly divided over continuing S8.D. Local representatives wanted to discontinue S8.D in the next permit, and state and federal representatives wanted the source identification work to continue.

15. *The goal for the June 1 meeting is to select a majority recommendation from among these four proposed alternatives (15a, 15b, 15c, 15d) to the RSMP pay-in requirement for S8.B in the next permit:*
    a. Discontinue funding for the S8.D Source Identification and Diagnostic Monitoring component and do not continue RSMP SIDIR projects in the next permit cycle.
    b. Redirect the S8.D funding to another RSMP component in the next permit cycle, and
        i. Have all SIDIR projects compete as S8.C Effectiveness Studies, or
        ii. Use the SIDIR funding for stream gaging under S8.B Status and Trends.
    c. Fund SIDIR as an RSMP effectiveness study in the next permit rather than as a separate RSMP component in the next permit, and/or
        i. Allocate half the SIDIR funding for analyzing results and findings, and/or

ii. Allocate half the SIDIR funding for developing methods and approaches.

d. Maintain the funding for S8.D Source Identification and Diagnostic Monitoring as a distinct RSMP component in the next permit and continue SIDIR analyses.