



DRAFT

Recommendations for future implementation of and changes/improvements to Municipal Stormwater NPDES Permit Special Condition S8 Monitoring and Assessment and 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, private, state, and federal entities coordinated by the RSMP Coordinator. The Stormwater Work Group (SWG) has been discussing RSMP implementation regularly at formal stakeholder meetings since the program's inception. The RSMP Coordinator has done an excellent job of getting the RSMP going and implementing "lessons learned" while launching the overall effort. The SWG offers Ecology the following recommendations for continuing to improve the RSMP, and for communicating to others about the RSMP:

RSMP funding and administration through the permits:

1. Maintain the current level and allocation of funding in the current permit.
 - a. Include funding from the new permittees for this permit cycle in the next permit at the same population-based proportional amount.
2. Continue invoicing permittees in the spring of each year.
3. Continue to maintain funds for each of the three RSMP components in separate accounts.
 - a. If needed, establish a new and separate account for Lower Columbia Habitat Status and Trends Monitoring (LC HSTM).
4. Continue distributing and posting RSMP quarterly budget and progress reports.
5. Continue to use the Pooled Resources Oversight Committee (PRO-Committee) to oversee RSMP expenditures and contracting decisions.
6. Increase the percentage of total budget allocated for administering the RSMP from 5% to 6% or 7% as determined by the PRO-Committee.
7. 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.

Pay-in approach and fee reduction alternatives:

8. Keep the pay-in option as the primary approach/ Do not allow opting out as an approach to fulfilling permit requirements, particularly for the RSMP Status and Trends component/ Fix the current opt-out approach/ Consider other opt-out approaches.
9. Give permittees financial credit for local monitoring programs.
10. Give permittees financial credit for serving on SWG, subgroups, and caucuses through reduction in required S8 RSMP contribution amounts or reimbursement from the RSMP accounts.



S8.B. Status and Trends Monitoring:

11. Continue this RSMP component.
12. Include local monitoring program sites and data.
13. Add stream gaging.
14. Use the LC HSTM study design approach to select future streams sites based on reaches draining a range of drainage areas rather than fixed length segments.
15. Collect sufficient data using the current design before making major changes to the approach.
16. Discontinue monthly grab sampling.

S8.C. Effectiveness Studies:

17. Continue this RSMP component.
18. Communicate findings of these studies through as many channels as possible.
19. Strengthen the feedback loop to the permits.
 - a. Clearly articulate how each current and future study will inform permit requirements or permittees' implementation of permit requirements.
20. Reduce the level funding for this RSMP component if the capacity or interest to get good studies going is not sufficient during the current permit cycle.
21. Include Illicit Discharge Detection and Elimination (IDDE) effectiveness studies in the next permit cycle.
 - a. Use the analysis of the IDDE incident tracking data submitted for this permit cycle to inform these priorities.

S8.D. Source Identification and diagnostic monitoring:

22. Continue this RSMP component/ Zero out funding for this RSMP component in the next permit cycle/ Redirect this funding to effectiveness studies.
23. Learn from this RSMP component to:
 - a. Identify education and outreach topics and audiences.
 - b. Prioritize regional stormwater initiatives and other ways state and federal agencies can assist permittees in reducing sources of illicit discharges, and
 - c. Inform the next permit S5.C and other relevant requirements, and
 - d. Report to councils and legislators on the value of IDDE programs.
24. Use this funding and write the next permit requirements to reduce permittees' duplicate record maintenance and reporting requirements.

For more information on these draft recommendations, see the caucuses' summary documents and past SWG, subgroup, and PRO-Committee meeting summaries.