



## King County

### Water and Land Resources Division

Department of Natural Resources and Parks

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TTY Relay: 711

January 12, 2016

Bill Moore  
Program Development Services Section Manager  
Water Quality Program  
Washington State Department of Ecology  
PO Box 47696  
Olympia, WA 98504-7696

RE: King County Water and Land Resources Division Recommendations for Improving the Regional Stormwater Monitoring Program

Dear Mr. Moore:

This letter articulates the King County Water Land and Resources (WLR) Division's recommendations for improving the Regional Stormwater Monitoring Program (RSMP) as part of the 2018 Phase I and Phase II Municipal Stormwater NPDES permit. We want to acknowledge the ongoing success of this program, and consider these comments to be minor adjustments. As a long-time supporter of the Stormwater Work Group, a significant funder of the RSMP, and a partner in implementing various aspects of the program, the WLR Division is pleased with the RSMP.

Our primary recommendation is to shift funding away from the Source Identification Information Repository (SIDIR) component of the RSMP into the development of a stream flow monitoring effort as part of the status and trends monitoring. The SIDIR program has not been the success that many had thought it would be, and the WLR Division recommends that this component of the RSMP be deprioritized and eliminated. This reprioritization of funds to stream flow monitoring would meet one of the objectives of the Stormwater Work Group's *2010 Stormwater Monitoring and Assessment Strategy for the Puget Sound Region* and subsequent recommendations, and also aligns with one of the primary objectives of stormwater management, which is proper stormflow management. We believe this evolution in permit conditions and the RSMP would take better advantage of local resources to achieve a more robust understanding of regional stormwater management. Our other recommendations include:

1. The WLR Division supports the continued implementation of status and trends monitoring at the same funding level established in the 2013 NPDES stormwater permits. The WLR Division does not support an increase in the number of sites, parameters, or cost associated with the sampling and analysis of status and trends water quality monitoring for the 2018 permit reissuance.
2. Skagit County and King County assisted in screening status and trends sampling locations and are assisting with the sample collection. The WLR Division believes that participation by local jurisdiction staff improves the RSMP, and recommends that a way be found to increase jurisdiction participation in the status and trends monitoring in the next permit cycle.
3. The WLR Division recognizes that several jurisdictions have opted to self-monitor as opposed to pay in to the regional collective fund for status and trends monitoring. We believe it is important to have a self-monitoring option and recommend that this be maintained in the next permit cycle. The WLR Division understands that the self-monitoring option will always have to meet certain minimum needs for successful monitoring programs and this drives the cost for individual jurisdictions. As a result, we recommend that the self-monitoring alternative continue to be more expensive than paying into a regional fund.
4. The WLR Division supports the continued implementation of effectiveness studies. However, we have a concern for the region's capacity to develop meaningful studies focused on permit effectiveness, manage those studies, and synthesize results in a way that can inform future permit implementation. We recommend that efforts be made to expand program capacity in the next permit cycle.
5. The monitoring conditions in the Phase I and Phase II municipal stormwater permits are funded by permitted jurisdictions for the advancement in achieving better water quality. There are many other stakeholders affected by the studies, including federal and state agencies, tribes, public interest groups, industries, and other NPDES stormwater permittees. Many of these organizations participate in the Stormwater Work Group, which directs the RSMP. We recommend that organizations participating in the Stormwater Work Group contribute to the pooled fund of the RSMP at a rate that is equivalent to the funding payments currently made by the permitted jurisdictions.

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We feel these recommendations would aid in the evolution of building a regional stormwater monitoring program that is focused on measuring the success and effectiveness of the region's stormwater management actions while simultaneously planning for the future of stormwater management. We are looking forward to continuing this dialogue with Ecology.

Sincerely,

  
  
Mark Isaacson  
Division Director  
John Taylor  
Assistant Division Director

cc: Curt Crawford, Manager, Stormwater Services Section, Water and Land Resources  
(WLR) Division, Department of Natural Resources and Parks (DNRP)  
Doug Navetski, Environmental Programs Managing Supervisor, Water Quality  
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