

SWG Local Government Caucus recommendations for changes to municipal stormwater permit conditions in S8 Monitoring and Assessment

This summary was prepared by Cami Apfelbeck on January 6, 2016 and has not yet been vetted by the caucus. It is a summary of the September 8, 2015 caucus meeting notes and includes notes from the discussion at the ensuing Stormwater Work Group meeting on September 16, 2015.

Overall:

Majority Consensus Recommendations:

- Maintain or reduce the current level of effort and funding
- Add a method for permittees to get financial credit (i.e., reduction in RSMP pay in or reimbursement through the pooled resources) for serving on Stormwater Work Group, committees, subgroups, or caucuses.
- Review results of effectiveness studies and apply new information to all requirements, particularly in section S5, of the next permit (and the Stormwater Management Manual)

Non-consensus opinions:

- Keep pay-in option as the primary approach
- Consider giving credit for local monitoring programs and including their sites
- Consider other opt-out approaches
- One local representative suggested that the Stormwater Work Group reiterate the recommendation not to allow opting out
- Spend more on status and trends and less on effectiveness studies and/or SIDIR

S8.B. Status and trends monitoring:

Majority Consensus Recommendations:

- Continue status and trends monitoring element

S8.C. Effectiveness studies:

Majority Consensus Recommendations:

- Continue effectiveness studies element
- Reduce this pool of funding if the capacity or interest to get projects going is not sufficient

S8.D. Source Identification and diagnostic monitoring:

Majority Consensus Recommendations:

- Shift priorities away from SIDIR in next permit cycle and zero out funding for that element of the regional program
 - Several caucus attendees expressed interest in having ERTS replaced or substantially upgraded, since there is a strong perception that it is not currently working due to long notification times
 - Several caucus attendees felt that information requested by SIDIR is already submitted to Ecology in other formats, so is a low priority given lack of staff resources and workloads

SWG Local Government Caucus recommendations for the RSMP outside of the permit (assume majority consensus unless otherwise noted)

Overall:

- Ecology should find a way to ensure that RSMP activities continue in the event of State budget stalemates.

Status and trends monitoring:

- Make sure data analysis and assessment is conducted well and in a manner that:
 - Provides the most utility to local jurisdictions, providing the ability to adaptively manage their stormwater management programs,
 - Includes comparison of results to those of local targeted monitoring programs, and
 - Explores methods by which the data gathered, particularly benthos data, can be used in the most effective manner to identify types of stressors to aquatic life
- Add stream gaging to the regional program for next permit cycle
- Decrease parameter list for status and trends (if assessment of current data should indicate appropriate)

Effectiveness studies:

- Strengthen the feedback loop to permit elements; make sure that studies are focused on permit requirements, as opposed to, BMP effectiveness
- \$6M per permit cycle might be too much for effectiveness studies given the challenges getting the studies proposed and the limited staff capacity to get studies up and running
- Streamline RFP process
- Coordinate studies with other efforts such as source control activities along the Duwamish River being done for the superfund process.
- (Non-consensus) Consider a study to model projected benefits to receiving water after application of S5 permit elements (individually and cumulatively) vs. benefits of alternative activities such as enhanced O&M, reliance on development/redevelopment, and ability to tailor S5 to flow surrogates
- (Non-consensus) Ensure that for the next permit, all studies are completed within the permit period and do not extend into future permit periods.

Source Identification and diagnostic monitoring:

- (Non-consensus) Remaining funds in SIDIR for current permit cycle should not be spent, because approach is not working; don't just spend the money because it is there.