

Evaluation of Possible New Monitoring Topics to Be Addressed by the Stormwater Work Group

Draft of April 10, 2012

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Criteria Approved by Stormwater Work Group

Need: What is the relative need and importance to increase our understanding of this stormwater topic?

Benefits: What are the projected benefits enhancing this area of stormwater monitoring?

Timing: What is our best window of opportunity? When will applicable permits be developed for reissuance?

Capacity: How difficult will it be to take this on? What are the projected costs and level of effort to develop monitoring recommendations for the topic? Are staff available to work on a new subgroup?

Institutional hurdles: What are the anticipated obstacles to succeeding?

Two-fers: What efficiencies might we gain by taking this on and combining with other efforts?

Table 1. Application of Criteria to New Monitoring Topic Ideas

Criteria	Roads and Highways	Industrial	Lakes	Combined Sewer Overflows
Need	Roads and highways represent about 10% of the land cover within the urban growth boundary. This represents an important contributing source of stormwater runoff	Compliance monitoring at over 1,500 industrial sites may have opportunities for improving information about stormwater practices and effectiveness and more closely coordinate with the regional monitoring effort.	Lakes, especially small urban lakes, are highly sensitive to stormwater runoff.	Seattle, King County, Bremerton, Tacoma, and Everett have combined sewer overflows. These discharges are included in wastewater discharge NPDES permits and have separate monitoring requirements.
Benefits	There is a great deal to be learned about road/highway runoff contribution to surface water impacts and approaches for mitigating impacts. There is opportunity to align WSDOT monitoring with overall stormwater monitoring	Costs to industrial permittees are reported to be substantial. There may be a method to obtain better value from their monitoring.	Large lakes, such as Whatcom and Washington are monitored by local agencies, but smaller lakes typically have no monitoring program.	There may be benefits to aligning the CSO and stormwater monitoring programs.

	strategy.			
Timing	WSDOT permit is to be reissued in March 2014. The timing is ideal to make recommendations to influence permit monitoring requirements.	The industrial permit expires in January 2015. The complexity of the industrial monitoring elements may take substantial time to thoroughly review.	None	CSO permits are included in individual wastewater discharge permits and their timing is variable.
Capacity	There is high degree of interest in this issue from multiple parties. WSDOT has offered staff to lead this effort.	There is a high degree of interest in this topic from the business caucus of the SWG. It is unclear how much interest there is in this topic among other SWG members. Boeing has offered to lead this effort.	There is a high degree of interest in this topic from the Seattle representative, it is unclear how much interest there is in this topic among other SWG members. There has been some interest expressed by the Seattle representative in leading this effort.	There is some interest from Seattle's representative on this topic. It is unclear how much other interest there is on this topic.
Institutional Hurdles	None	Direction on industrial monitoring from the PCHB rulings and Ecology needs to be reviewed to understand institutional hurdles. In addition, it is unclear if the SWG is properly organized to tackle this issue with only two business representatives.	None	CSO and wastewater systems have a large number of stakeholders that may need to be involved in this process.
Two-fers	This monitoring would be useful to local departments and to WSDOT. The geographic scope of WSDOT's permit covers parts of western and eastern Washington.	Industrial monitoring may coordinate nicely with the nearshore ambient monitoring efforts. There may also be benefits with the IDDE and other municipal programs.	None	Monitoring is required under two different NDPES permits, this might allow for aligning those programs.

Recommendations:

The Work Plan Subgroup recommends that the Stormwater Work Group convene a Roads and Highways Monitoring Subgroup to develop recommendations for a comprehensive stormwater monitoring program for Puget Sound roads and highways, along with a subset of specific recommendations on monitoring to include in the next Washington State Department of Transportation stormwater NPDES permit. The subgroup's recommendation is based on the amount of expressed interest in this topic from SWG members, WSDOT's interest in leading this subgroup, and the timeliness of completing the recommendations prior to issuance of WSDOT's next NPDES permit.

The Work Plan Subgroup also recommends that the Stormwater Work Group further explore issues surrounding the industrial stormwater monitoring before deciding whether to convene an Industrial Stormwater Monitoring Subgroup. Issues to explore include level of commitment from business and industrial representatives, PCHB rulings, Ecology interests, and industrial permittee interests.