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)~~(Relevant to S8.B only) Pooled funds for Puget Sound S&T should remain focused on Puget Sound S&T monitoring.
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.
    a. S8.B S&T: Hasn't worked well this permit cycle; aim of these recommendations is to make it work better if the opt-out continues. Pierce Co and Redmond as S&T opt-outs are treated separately and not included in RSMP; they should be

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required to do something different. Seattle might opt out next time; Redmond has indicated that they will not. Maintain strong incentive for continuing to participate in the regional program. It's very resource heavy at Ecology and WDFW to have these options. How best to have opt-outs contribute to the regional analysis and reports? Could there be a smaller minimum contribution? Only two permittees selected this option. Data aren't as useful as was intended. Want best possible scientific outcome. How can opt-outs provide meaningful info for the rest of the region?

~~8.~~b. S8.C Effectiveness: Working better. Phase I permittees Seattle and Clark Co are doing meaningful effectiveness studies as partial opt-out. Tacoma wants more credit for what they are doing for effectiveness monitoring opt-out. Can these programs be folded back in? How are these results folded back into the RSMP and shared with other jurisdictions? This is the forum but it's not the RSMP Coordinator's job to do this; however, Brandi approves these QAPPs and it affects her capacity.

9. Give permittees financial credit for local S&T monitoring programs, or require them to provide additional information to match the RSMP. Still an issue for local jurisdictions not having an RSMP site in their jurisdiction. Can't have a statistically meaningful regional program with a site in each of 93 jurisdictions.
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. Not consensus from local folks. This is part of the job. Also hard to see how this would be implemented via the permit. Challenge to incentivize participation. Find other ways to do this. Not a good way to spend the RSMP account. Look at public ed and outreach component of permit for ideas.

S8.B. Status and Trends Monitoring:

11. Increase funding for S&T for stream gaging.

~~11.~~12. Continue this RSMP component.
~~12.~~13. Include local monitoring program sites and data.
~~13.~~14. Add stream gaging.
~~14.~~15. 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.~~16. Collect sufficient data using the current design before making major changes to the approach.
~~16.~~17. Discontinue monthly grab sampling.

S8.C. Effectiveness Studies:

~~17.~~18. Continue this RSMP component.
~~18.~~19. Communicate findings of these studies through as many channels as possible.
~~19.~~20. 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.

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~~20.~~21. 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.~~22. 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:

23. Continue this RSMP component/ Zero out funding for this RSMP component in the next permit cycle/ Redirect this funding to effectiveness studies / redirect funding to S&T for stream gaging.

~~22.~~a. Local governments did not understand this well when the original recommendation was made. Would like to bring this back for more conversation.

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~~23.~~24. 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.~~25. 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.