October 29, 2010

Ted Sturdevant, Director
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Sturdevant:

The Stormwater Work Group (SWG) is a coalition of federal, tribal, state and local government, business, environmental, agriculture, and research interests working to develop a Stormwater Monitoring and Assessment Strategy for Puget Sound. The strategy is intended to provide a coordinated, integrated approach to quantifying the stormwater problem in Puget Sound and to help us efficiently and effectively manage stormwater to reduce harm to the ecosystem.

In the past year we have reached two important milestones. On July 1, 2010 the SWG submitted to you and to the Puget Sound Partnership our 55 Key Recommendations for a new regional stormwater monitoring program for Puget Sound. Today we are submitting 33 further recommendations focused on proposing stormwater monitoring requirements that the Department of Ecology (Ecology) should include in National Pollutant Discharge Elimination System (NPDES) municipal stormwater permits for Puget Sound. The region's five Phase I and 76 Phase II cities and counties, the state Department of Transportation, and the Ports of Tacoma and Seattle are subject to these permits.

Our latest recommendations are divided into two categories, the first describing how to pool resources to maximize efficiency, and the second describing the components of the monitoring program. The first category of these recommendations focuses on creating an administrative means (the "pay-in option") to pool the resources of municipalities and others to conduct regional monitoring and assessment activities. The pay-in option is important to allow all permittees, including small jurisdictions with no monitoring capacity or expertise, to contribute collectively and equitably to a regional monitoring program that answers important questions about managing stormwater. We believe that, at this time, Ecology is the only viable entity capable of administering the pay-in option for the next permit term scheduled for 2012-2017.

The second category of these recommendations focuses on describing which specific monitoring activities should be conducted or paid for by NPDES municipal stormwater permittees. In the previous recommendations in our July 1, 2010 report, we proposed that a new type of monitoring focused on receiving waters, instead of outfalls, be required for the next permit term. There is strong support of this overall concept by our work group caucuses and by the nearly 200 stakeholders that attended our three public workshops on *Stormwater Monitoring for the Future*. In our new *Recommendations for Municipal Stormwater Monitoring* we specifically recommend that municipal stormwater permittees collectively conduct or fund:

- Status and trends water quality, sediment, and stream benthos monitoring of small streams at 50 sites inside Urban Growth Areas and 50 sites in rural areas in the Puget Sound Lowlands, and assessing stream gauging activities and future needs.
- Status and trends monitoring of as many as 50 marine nearshore sites for bacteria, toxics in sediment, and toxics in mussels.

- Improved information sharing and coordination for source identification and diagnostic monitoring, and development of a region-wide database for reporting source identification and diagnostic monitoring data so that analyses can be made to support new policy initiatives.
- Effectiveness studies focused on each of the six programmatic stormwater management elements required in the permits.

The monitoring activities we are recommending are founded on existing local, state, and federal program capacity and further supported by funds that will be contributed by municipal stormwater permittees in Puget Sound. At this time we have not identified specific new additional state funding requests for Ecology or the Partnership. However, we do support your efforts to seek funding to support the infrastructure and processes required to sustain the program. We have identified specific existing state monitoring programs to continue in order to address stormwater, and we encourage strategic expansion of the recommended monitoring activities to answer more questions about the ecosystem and about the effectiveness of stormwater management activities to improve conditions in Puget Sound.

Now that the SWG has made its 33 further *Recommendations for Municipal Stormwater Permit Monitoring*, the group will continue to work with the Department of Ecology and others to ramp up for implementation of the new regional stormwater monitoring program. At the same time, the group will turn its attention to working with the Puget Sound Partnership to incorporate their efforts into the ecosystem monitoring program currently being developed by a launch committee. In the coming months, the SWG will begin developing a new work plan for 2011 and beyond, detailing how it plans to continue progress toward a comprehensive regional stormwater monitoring program.

We appreciate Ecology's continued support of our efforts and look forward to meeting with you to discuss our monitoring recommendations for the NPDES municipal stormwater permits. Please feel free to contact either me at 206.296.1986 or jim.simmonds@kingcounty.gov or Karen Dinicola, our Project Manager, at 360.407.6550 or karen.dinicola@ecy.wa.gov if you have any questions or concerns.

Sincerely,

Jim Simmonds, Chair
Stormwater Work Group

Attachments

cc: David Dicks, Executive Director, Puget Sound Partnership
Bill Wilkerson, Chair, Forum on Monitoring Salmon Recovery and Watershed Health