

EMAIL COMMENT

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Conversation: Comment Regarding S.8.C Ecology's Phase I municipal Stormwater General Permit--Preliminary Draft Language

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Alternative to Paying in for Monitoring Described in the Preliminary Draft NPDES Stormwater Permit Requirements.

Consider dividing the Puget Sound area in to three regional monitoring groups each with a regional project manager, technical staff, and field staff. These regional monitoring groups would implement status and trends (both nearshore and wadable streams) and effectiveness monitoring. The regional monitoring groups would report directly to a regional monitoring project manager housed at Ecology. The SWG oversight committee would continue to provide review of the Ecology PM and the regional monitoring program.

Ecology should consider allowing municipalities (Phase I and II's) with qualified staff available to submit in-kind services in lieu of paying in. Ecology could review the resumes of staff being offered for in-kind services and use these local, qualified municipal staff to operate the regional monitoring groups. The staff would be paid by the municipalities, but would implement and report to the Department of Ecology. In addition, municipalities could get in-kind credits for the use of vehicles and equipment.

Those municipalities that do not have qualified staff, or needed equipment could still pay in to the system. These funds would be used to pay for additional equipment needed, laboratory costs, and other needed expenses. Ecology staff could manage these funds and have regional project manager's forward approvable invoices to Ecology for payment.

This approach would create a more regional, invested approach utilizing local staff with in each region. Additionally the regional staff would be able to coordinate on a Puget Sound wide scale to refine hypothesis, develop SOPs, troubleshoot issues and maintain a regional approach. Cost saving would also be realized by simplifying the contracting needs, reducing the need to manage funds through reimbursements, and ensuring local government are utilized in the implementation of the program.

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