

**Sinclair & Dyes Inlets Fecal Coliform TMDL
Local Coordination Meeting
June 12, 2008**

10:15 to 11:00 Powerpoint presentation (Sally Lawrence, Ecology TMDL Lead)

Questions and comments following presentation:

Q. How will Ecology set Wasteload Allocations (WLAs) for monitoring locations that may be under the responsibility of multiple jurisdictions? For example, a location could be affected by stormwater from a Phase II municipality and from state highway stormwater (WSDOT, a Phase I municipal stormwater permittee).

A. If information is available about sources, WLAs are assigned to the jurisdiction with authority for the source. Frequently in TMDLs multiple sources are possible and all jurisdictions with some responsibility are assigned WLAs.

Q. How does Ecology work with WSDOT on TMDLs?

A. Ecology and WSDOT expect to meet annually and review high priority current TMDLs as well as future TMDLs. The expected outcome of annual meetings will be a set of priorities for WSDOT environmental work as resources are available.

Q. Which agency will be responsible for monitoring the waterbodies in this TMDL?

A. The implementation plan will include a monitoring plan. This will be developed with input from local agencies. The partnership that Puget Sound Naval Shipyard put together for stream and marine stormwater sampling was very effective in covering a large area to accomplish specific monitoring goals.

Q. Where can I obtain a copy of the Navy's TMDL Modeling Report, dated April 22, 2008?

A. Contact Robert K. Johnston, Navy Technical Lead for Project ENVVEST, at johnston@spawar.navy.mil or contact Sally Lawrence, Ecology TMDL Lead, at slaw461@ecy.wa.gov

Q. Can Ecology make today's Powerpoint presentation available?

A. Yes, look for it on Ecology's Sinclair-Dyes TMDL website at http://www.ecy.wa.gov/programs/wq/tmdl/sinclair-dyes_inlets/index.html after June 25, 2008.

Q. There are a number of programs already in place to address parts of the fecal coliform problem—the Phase II stormwater program; Bremerton's commitment to CSO reduction;

and Kitsap Health's ongoing work with owners of on-site sewage systems. So, we need to look globally at other sources and other types of requirements that may be needed. How will the TMDL do that?

A. The implementation meetings in fall 2008 (September 25th and December 4th) are intended to help fill in these gaps in the TMDL. Ecology will be asking the Phase II permittees (and other participants) to help with a "gap analysis," which will help Ecology compare what is already being done with what is needed, to reduce fecal coliform inputs throughout the basins.

Q. Can we move quickly toward establishing the WLAs and submitting the TMDL to EPA so that the recommended solutions will qualify for grants?

A. We're trying!

Q. Does Ecology recognize there is a reality in terms of how clean some of these streams can get?

A. The water quality standards recognize that different concentrations of "background" fecal coliform are acceptable, because the bacteria standards are not zero. Ecology would need to be presented with carefully documented efforts to reduce bacteria throughout a watershed before we would determine that a number higher than the standards is the best we can do. The Water Quality Standards include a regulatory path for developing a criterion that is less stringent than the standard, called Use Attainability Analysis (173-201A-440 WAC).

Q. Future growth can be included as an allocation in a TMDL. The Navy's modeling results have shown that as development intensity increases, so does FC concentration. So, why not include an allocation for growth?

A. The "uncertainty analysis" for the Navy's model was a future development scenario that looked at only one part of the watershed (Northern Dyes Inlet Alternative Futures Project) and so the results can't be applied quantitatively to the whole watershed, which we would need to do for the TMDL. However the outcome of the modeling for that sub-basin, and the results of the 2005 Sinclair and Dyes Inlets watershed bacteria characterization report (<http://www.ecy.wa.gov/biblio/0503042.html>) both lead to fairly similar conclusions and recommendations about going forward with pollution prevention through municipal stormwater and Health District programs, and working to get more stormwater infiltrated rather than piped to streams and marine waters. With limited staff time for producing this TMDL, Ecology wonders whether the TMDL would accomplish more by adding to an already extensive modeling effort versus putting our time into developing an implementation plan with recommendations that will be effective on the ground (and in the water)? (Your comments welcome.)

Ecology believes that the most challenging pieces of this TMDL (and where we need the thoughtful participation of local groups) will be to define Best Management Practices that will be effective in reducing fecal coliform bacteria going to marine waters.

Questions and comments about the fall 2008 Implementation meetings:

Ecology asked participants:

- Please review the following ideas for speaker topics or panel discussions and send us your comments.
 - Highway stormwater treatment –WSDOT research
 - Update on stormwater public outreach (Kitsap area and King County-led consortium)
 - IDDE programs, IDDE training (Kitsap County Health Department?)
 - Planning and public works departments – why they work differently, ways to work together
 - Marinas?
 - Nonpoint sources – is there enough oversight?

- Please suggest other topics that would be useful to you.

- Should the implementation meetings be organized with a geographic focus?

Topics suggested by participants:

- Update on LID ordinances adopted by local municipalities; encouraging more developers to use LID
- What to do about “vested” properties (those that are allowed to be developed under older rules)?