National Pollutant Discharge Elimination System
Municipal Permit
Clarification of Permit Conditions

March, 1995

This document has been developed jointly by the Department of Ecology, municipal permittees of Western Washington, (Seattle, King County, Snohomish County, Tacoma, and Pierce County), and the Department of Transportation, with the assistance of Bellevue. The purpose of this document is to provide clarification in interpreting permit conditions and in reviewing Stormwater Management Programs to be submitted by permittees for the first permit cycle. The parties recognize that NPDES permits and stormwater management programs will be subject to public review. The permittees and Ecology may choose to modify this document based on comments received from the public or experience gained during the course of permit implementation.

NPDES MUNICIPAL PERMITS

AREAS OF SUBSTANTIAL AGREEMENT ON OVERALL PROGRAM EXPECTATIONS

Overall Outcomes

Ecology and municipalities will meet their obligations under the Clean Water Act.

1. Programs will demonstrate an allocation of resources based on a clear set of local water quality priorities and objectives that address specified water quality problems. Identification of priorities and objectives by watershed is an important goal.

2. Determination of permit compliance within the first permit cycle will be based on progress in implementing stormwater management programs rather than success in achieving water quality standards.

3. Municipal (and agency) programs will differ substantially, based on widely varying priorities, past levels of effort, and service area transitions. This suggests there will be no common yardstick by which to measure an appropriate level of effort for a given program component like monitoring. Each agency's program should be evaluated separately based on whether efforts are tailored to address local water quality priorities.

4. Existing programs will comprise the majority of Stormwater Management Program (SWMP) efforts. Much of permit compliance will consist of explaining how existing programs address the requirements of the Clean Water Act.

5. The long term goal of Stormwater Management Programs is to attain and protect beneficial uses as defined in the state water quality standards.

Overall Problems/Constraints

1. Compliance with current water quality standards may not be achievable given current technologies.

2. Current numeric standards for water quality are not always the best measure of the condition of beneficial uses.

3. Numeric water quality standards and definitions of beneficial uses may change over time.

4. Understanding of the cause and effect relationship between stormwater discharges and receiving water impacts is poor, making it difficult to set priorities and be sure solutions are cost effective.

5. Procedures are inadequate for determining whether some standards are violated.

6. It is very difficult to design an appropriate way to measure the success of SWM programs. Because of the difficulties in measuring problems and in quantifying the benefits of programs, standard monitoring techniques cannot well evaluate program success. Because of widely varying local conditions, expenditure per capita ma*y* not be a useful tool for judging program performance.

7. Increasing the level of funding for SWM programs through fees or taxes is extremely difficult politically for local governments, probably more so than at any time in recent decades. Impending incorporations mean shrinking revenues for some counties. The outlook for counties may be a reduced level of effort in SWM programs, with more focus on priority areas rather than across the board increases in spending.

8. The proposed permit and 40 CFR do not address priorities among program elements. Limited resources require clear priorities to develop SWMPs.

9. Permittees do not have control over all nonpoint sources that impact surface waters. This includes not having control over ubiquitous sources such as airborne pollutants, and stormwater runoff from areas outside the area covered by the permit such as other cities and federal lands.

10. The permit applies only to separate storm sewer systems owned or operated by the permittee, not to other stormwater discharges (or discharges other than stormwater) within a permittee's jurisdiction.

11. For purposes of this permit the Washington State Department of Transportation (WSDOT) is considered a municipality; however, as a state agency WSDOT may not have the legal authority or agency mission to respond to all of the general permit language in the same manner as a municipality. Some unique differences are identified in the permit by including language specific to WSDOT. Additional clarifications of municipal stormwater permit requirements for WSDOT are described in a Letter of Agreement between WSDOT and Ecology.

Area of Divergence

Some permittees remain opposed to Ecology's decision to issue a combined NPDES and State Waste Discharge Permit (SWDP). The permittees maintain that the purpose of the SWDP is to control wastewater discharges to groundwater, not to control stormwater discharges to surface waters. The permittees also maintain that the inclusion of groundwater controls in a stormwater permit is not required or intended by the Clean Water Act or its implementing regulations, and that implementing groundwater controls will divert resources from high priority stormwater management programs.

Ecology maintains that combining the two permits is consistent with aims of regulatory reform: it avoids applying two different regulatory mechanisms to deal with one pollution source, i.e., stormwater, and reduces administration and compliance costs. Ecology points out that groundwater protection has long been a key element in the Stormwater Management Manual required by the Puget Sound Water Quality Plan and this permit. Ecology notes that no new

program requirements were added because of the decision to combine the permits: the requirements for groundwater protection are the same as those already included for stormwater management.

S7.B.1 PLANNING

Outcomes:

1. The permittees have an established planning process for developing stormwater management programs that includes needed participation by managers, elected officials, the public and other agencies.

2. There is a commitment to implementation of the SWMP by all affected and appropriate department managers and elected officials.

Expectations:

1. The proposed program will describe the planning process used to develop the program that involved responsible elected officials and department managers accountable for any aspect of program development and implementation.

2. For the first permit Ecology does not expect that the SWMP itself will go through a stand-alone public review or elected official approval (Ecology does expect at least a briefing of elected officials). Instead, most of the individual programs that make up the SWMP will have undergone public and council review. For the next permit, Ecology's expectation is that stormwater management programs will receive stand-alone review.

Problems/Constraints:

1. Permittees do not have control over all aspects of permit implementation requirements. This includes other public entities that are responsible for necessary stormwater management program components such as health districts and park districts.

S7.B.2 NEEDS AND PRIORITIZATION

AREAS OF AGREEMENT:

Outcomes:

1. 1.SWMPs demonstrate an allocation of resources based on a clear set of local water quality priorities and objectives that address specified water quality problems. Identification of priorities and objectives by watershed is the long range objective.

2. 2.SWMPS demonstrate a sufficient allocation of resources to make reasonable progress over the permit period in achieving the long term goal of protecting beneficial uses by minimizing impacts from stormwater runoff and land use development.

Expectations:

1. It is unreasonable, initially, to expect an overall prioritization system to drive all stormwater programs within a municipality. Within a municipality there are multiple agencies with multiple, competing priorities which have undergone separate public review. It is reasonable for Ecology to expect an explanation about how these priorities have been determined and for permittees to move toward establishing an overall prioritization system.

2. Increased density and traffic due to growth management planning for urban growth areas will likely result in increased water quality and quantity problems in areas of increased density. Growth management, planning, and zoning decisions cannot override environmental laws, and although Ecology cannot be expected to waive or reduce water quality standards in areas of increased density, permittees are not expected to set priorities solely on the basis of the severity of problems as measured by deficiencies in meeting current water quality standards.

3. Needs and Prioritization--Supporting Analyses:

   SWMPs will include an explanation of how program needs have been determined and prioritized and how resources allocation decisions have been made. This explanation will comprise data and supporting analyses that address the following topics. (Although the information and analyses need not be presented in the precise categories or sequence listed below, the basic concepts indicated should be addressed.)

A. *Information Basis:* Presentation and evaluation of information used to identify needs and establish priorities, including current and projected population densities, land use and zoning decisions, watershed hydrology, water quality data, and other information relevant to evaluating program effectiveness and the impacts of stormwater on receiving waters and beneficial uses within the permittee's jurisdiction.

B. *Problem Identification*: Identification of present and predicted water quality problems (surface water, groundwater, and sediment problems) attributable to stormwater runoff, including an analysis of stormwater impacts on beneficial uses and ecosystems. Watershed plans and

similar efforts to identify water quality problems through a combination of scientific analysis and public involvement may be used as a basis of problem identification. SWMPs are expected to focus on problems strongly linked to stormwater runoff.

C. *Solutions*: A list of solutions to the problems identified. Current budgets should not constrain the identification of effective solutions; however, it is expected that permittees will focus on solutions that are feasible and cost-effective.

D. *Existing Programs*: A description of what the permittee is now doing to solve problems identified in B.

E. *Program Needs*: Identification of program needs by comparing solutions to existing programs. Possible program enhancements should be identified for all significant problems not addressed by current activities; however, prioritization will mean that only some program enhancements are funded in any given permit period.

F. *Prioritization*: A description of and justification for the permittee's priorities for continuing existing programs and implementing new programs or program enhancements. There should be a clear link between the prioritization of problems/solutions and the allocation of resources to stormwater management programs.

G. *Stormwater Management Program*: A description of level of effort, implementation schedule, and proposed budget for each program component over the term of the initial permit, beginning in 1996. During the first three years of the initial permit, permittees will not be expected to increase expenditures to address unmet needs. Permittees may be expected to reallocate existing revenues during this period based on the needs and priorities analysis of E and F above.

4. <u>Needs and Prioritization--Detailed Guidance</u>

A. *Balance of Preventive and Corrective Programs*: SWMPs are expected to have a mix of preventive and corrective programs and projects. The appropriate balance between preventive and corrective efforts should be based on the needs/ prioritization analysis described in #4 above. The allocation of resources among preventive and corrective programs should reflect the overall goals of improving, maintaining, or preventing degradation of beneficial uses and making progress on the four purposes of the permit as stated in condition S7.b. (to reduce the discharge of pollutants; reduce impacts to receiving waters; eliminate illicit discharges; and make progress toward compliance with surface water, ground water, and sediment standards).

B. *Priority on Source Controls*: Keeping pollutants out of the environment is generally the most effective and efficient means of preserving or improving water quality. Therefore, both preventative and corrective programs should emphasize source controls.

C. *Cost-effectiveness as a Criterion for Prioritization*: The costs of implementing solutions weighed against the expected benefits may be used as a criterion for establishing priorities.

D. *Consideration of Community Values*: Permittees may set priorities and allocate resources based on the relative importance of beneficial uses to the constituents served by the permittee. Protection and enhancement of beneficial uses determined, through public involvement, to be of high value to the community is an important criterion for establishing priorities and funding programs.

E. *SWMPs Expected to Evolve*: The activities and funding allocations established in a SWMP are expected to evolve based on new information, analysis, and public comment throughout the permit period. Annual adjustments to programs and levels of effort are to be anticipated. Within any calendar year, a permittee may reallocate up to 20% of the annual SWMP budget without prior Ecology approval, as long as the reallocation is noted and justified in the permittee's annual report.

Problems/Constraints:

1. The permit does not prioritize program components or prioritize requirements within program components to provide guidance in developing SWMP priorities.

2. There is no clear guidance in law for the permittees and Ecology to identify an acceptable level of effort for a program. It is extremely difficult to define criteria to decide whether adequate progress is being made to address identified needs

3. The imperfect understanding of the cause and effect relationship between stormwater discharges and receiving water impacts makes it difficult to set priorities and be sure solutions are cost effective.

4. There is no widely accepted method of cost/benefit analysis for evaluating stormwater management programs.

S7.B.3 LEGAL AUTHORITY

Outcomes:

1. Permittees have adequate legal authority and establish necessary interlocal agreements to control discharges to municipal separate storm sewers in accordance with 40 CFR 122.26 (d) (2) (I).

2. Ecology will issue municipal stormwater permits to drainage districts, which will be co-permittees with overlying municipalities..

Expectations:

1. The permittee has adequate legal authority or has a strategy and a schedule to obtain the authority within 2 years of permit issuance. The authority should provide the ability to:
   -control industrial discharges
   -prohibit illicit discharges
   -control spills and dumping
   -control discharges form one jurisdiction to another
   -require compliance through appropriate legal tools
   -carry out inspection and enforcement to insure compliance

2. Permittees may emphasize technical assistance, business outreach programs, and public education as long as basic legal authority is in place.

Problems/Constraints:

1. Some permittees have not put in place legal authority to address groundwater or sediment quality.

2. Legal authority does not cover all relevant agencies that impact receiving waters, e.g., other jurisdictions and health districts.

3. The political climate and funding impose severe constraints on regulatory options. (The McCready decision severely limits inspection capability of municipalities.)

S7.B.4 MONITORING

AREAS OF AGREEMENT:

Outcomes:

1. Permittees will establish monitoring programs to evaluate the effectiveness of the SWMP in reducing pollutants discharged and reducing impacts to receiving waters or habitat.

2. Permittees may share monitoring data and/or develop joint monitoring programs. SWMPs may assume the use of this shared data in proposing a level of effort.

Expectations

1. Monitoring objectives will be based on the prioritized needs and proposed solutions identified by individual jurisdictions or by multi-jurisdictional associations.

2. Permittees will focus monitoring efforts toward evaluating BMPs, identifying problems, correcting identified problems, and evaluating the effectiveness of the SWMP.

3. Permittees will not be expected to institute new groundwater or sediment monitoring during the first permit cycle unless such monitoring is identified as a high priority in the SWMP.

4. Monitoring programs for the first permit term do not need to include all objectives listed in S7.B.4.

5. Each permittee will be expected to do some independent monitoring to evaluate overall program effectiveness; shared data may be used for BMP evaluation, land use characterization, and other appropriate analyses useful for guiding resource allocation decisions.

Problems/Constraints

1. Compliance with current water quality standards may not be achievable given current technologies.

2. Current numeric standards for water quality are not always the best measure of the condition of beneficial uses.

3. Numeric water quality standards and definitions of beneficial uses may change over time.

4. The cost of monitoring can be a significant expense for the jurisdictions, while failing to produce useful information commensurate with cost.

5. Understanding of the cause and effect relationship between pollutants and damage to beneficial uses is poor, making it difficult to set priorities and be sure solutions are cost effective.

6. Monitoring protocols to determine stormwater impacts to sediment or groundwater have not been sufficiently established.

7. Procedures for determining whether some standards are being violated are lacking.

8. Wet weather criteria are needed to reflect episodic nature of stormwater runoff.

9. Monitoring results to evaluate SWMP effectiveness may be masked or offset by continued development and land use changes resulting from GMA policies.

S7.B.5 FISCAL ANALYSIS

AREAS OF AGREEMENT:

Outcomes:

1. Permittees will provide a fiscal analysis of funding needs for staff, equipment and capital facilities to implement the proposed SWMP during the permit term.

2. SWMPs will present a budget for each year of the current permit period.

Expectations:

1. The fiscal analysis will describe the anticipated source of funding for the SWMP, and a strategy for securing funding where shortfalls exist. The analysis will explain any limitations on spending funds identified.

2. The fiscal analysis will estimate staff, equipment and funding needed for each program component required by section S7B of the municipal permit.

3. The SWMP budget will propose annual funding levels during the term of the permit for for each program component required by section S7B of the municipal permit.

4. The fiscal analysis will identify anticipated cost-sharing arrangements among permittees intended to reduce individual permittee costs of permit compliance.

5. Permittees are not expected to submit a detailed inventory of all equipment necessary to implement the SWMP.

S7.B.6 BACKGROUND INFORMATION

AREAS OF AGREEMENT:

Outcomes:

1. SWMPs will describe the existing system for gathering, maintaining, and using information needed for planning, priority setting, and program evaluation; identify any needed improvement to the system; and provide an implementation schedule.

S7.B.7 INTERGOVERNMENTAL COORDINATION

AREAS OF AGREEMENT:

Outcomes:

1. SWMPs will address coordinated watershed management activities among jurisdictions where cost effective or beneficial for shared waterbodies.

Expectations:

1. SWMPs include a description of mechanisms to address stormwater problems that span political boundaries.

2. Data management and mapping will be coordinated among permittees to the extent feasible.

3. Monitoring and modeling activities are coordinated among permittees to the extent feasible.

4. A watershed planning and management process may be used by jurisdictions for identifying management goals and the roles and responsibilities of the participants. The scale of watershed, e.g. regional, river basin, sub-basin, will be identified by the jurisdiction(s) involved.

5. Municipalities are expected to identify and prioritize activities which WSDOT can undertake to assist in implementing municipal SWMPs. WSDOT is expected to consider these priorities in developing its permit and statewide priorities.

Problems/Constraints:

1. Permittees have no power to compel cooperation among themselves.

2. Coordinating strategies for "shared waterbodies" essentially requires coordinating <u>all</u> programs.

3. Different watershed management plans in a common permit area may have competing or conflicting management recommendations.

S7.B.8.a NEW DEVELOPMENT, REDEVELOPMENT AND CONSTRUCTION SITE RUNOFF

Outcome:

1. 3.The contribution of stormwater pollution from new development and re-development is minimized, and impairment of beneficial uses is minimized.

Expectations:

1. SWMPs include a description of existing programs to control runoff from new development and redevelopment. Or, if necessary, SWMPs include a proposed plan and schedule for a program of permitting, inspecting, and enforcing which provides competent, timely regulation of all new development and redevelopment.

2. Permittees are expected to consider land use regulation as a means of minimizing stormwater impacts.

3. Municipalities adopt an ordinance, minimum requirements and BMPs equivalent to those in Ecology's Stormwater Management Manual. Ecology's equivalency guidance dated March 1994 will be used to determine equivalence.

4. SWMPs must include a process to make available copies of the “Notice of Intent for Construction Activity” and/or copies of the NOI to representatives of proposed new development or redevelopment.

5. Permittees will continue to enforce local ordinances controlling runoff from construction sites that also require coverage under the Baseline General Permit for Discharges Associated with Industrial Stormwater.

6. To achieve success in protecting beneficial uses, permittees may be able to rely on Ecology to exercise its enforcement powers in severe situations to address nonpoint pollution. This must occur in concert with municipal enforcement.

Problems/Constraints:

1. There is limited political ability to adopt and enforce additional ordinances.

2. The effectiveness of compliance actions is difficult to measure.

3. Education is needed to assist contractors with implementing stormwater quality requirements.

4. Increased density due to growth management planning for urban growth areas results in increased water quality and quantity problems. These must be taken into account in controlling runoff from new development.

S7.B.8.b CONTROL OF RUNOFF FROM EXISTING RESIDENTIAL AND COMMERCIAL DEVELOPMENT (INCLUDES RETROFITTING CONCEPT)

Outcomes:

1. Programs include appropriate treatment and source control measures (both structural and non-structural) to reduce pollutants in runoff from existing commercial and residential areas.

Expectations:

1. SWMPs include a description of existing programs to control runoff from existing commercial and residential areas.

2. SWMPs include a plan and schedule for implementing structural and non-structural treatment and source control measures (including retrofitting) for the highest priority developed areas. This includes implementation of BMPs by public agencies and private entities.

Problems/Constraints:

1. It is difficult to accurately assess the water quality benefits of retrofitting existing development with BMPs.

2. Retrofitting is expensive and may not be cost-effective compared to other means of improving water quality.

3. If requirements for retrofitting/re-development/in-filling are too stringent the effect is to encourage growth outside of urban growth boundaries.

S7.B.8.c O & M OF MUNICIPAL STORM SEWERS

Outcomes:

1. SWMPs include operation and maintenance programs for new and existing stormwater facilities owned by the permittee within the area of permit coverage.

2. Permittees adopt an ordinance, interlocal agreement, or other enforceable mechanism establishing responsibility for operation and maintenance of other facilities that discharge into municipal separate storm sewers owned or operated by the permittees.

3. SWMPs will specify proposed methods of disposal of street waste decant.

Expectations:

1. SWMPs will include a description of existing O & M programs that will be continued. O & M programs will establish policies for the desired methods and frequencies for inspecting and maintaining stormwater facilities, including catch basins, conveyances, and treatment BMPs. SWMPs will include a plan and schedule implementing those policies if initial capabilities fall short.

2. Permittees will adopt ordinances requiring maintenance of stormwater facilities not owned by the permittee, or permittees will propose a schedule for adoption and implementation of an ordinance.

3. Upon completion of Ecology guidance for street waste disposal, permittees develop a strategy and schedule for a program for adequate disposal of street wastes.

Problems/Constraints:

1. It is difficult to determine the most cost-effective allocation scheme for variable storm sewer maintenance within a service area.

2. Ecology has not issued guidance for street waste disposal.

3. Securing adequate budget for reasonable maintenance is a problem at current utility rates (for most utilities), and the prospects for increasing rates are not bright.

4. Maintenance of storm drainage facilities for efficient detention and conveyance of stormwater runoff sometimes conflicts with the objective of protecting wetlands.

S7.B.8.d O & M ROADS AND HIGHWAYS

Outcome:

1. Permittees develop and implement standards and policies that minimize water pollution from road surface and rest area operation and maintenance in a cost-effective manner.

Expectation:

1. SWMPs will include a description of existing road operation and maintenance programs that will be continued. Programs will establish policies for desired cleaning methods and schedules, litter control strategies, road surface maintenance, and de-icing procedures. SWMPs will include a plan and schedule implementing those policies if initial capabilities fall short.

S7.B.8.e CONSIDERATION OF WATER QUALITY IN FLOOD MANAGEMENT PROJECTS

AREAS OF AGREEMENT:

Outcomes:

1. Flood management projects should include water quality controls where beneficial and feasible.

Expectations:

1. Water quality objectives are to be considered in design and implementation of flood management capital projects. SWMPs are to address how this will be accomplished.

2. Municipalities expect to identify existing flood management projects that are amenable to cost effective water quality retrofit and then develop, based on municipal priorities, a schedule to retrofit these projects.

Problems/Constraints:

1. This permit requirement adds to the cost of projects that may be urgently needed to protect public safety.

2. Very little funding is expected to be available for retrofitting existing flood control projects.

S7.B.8.f. REDUCTION OF WATER POLLUTION FROM PESTICIDES, HERBICIDES, AND FERTILIZERS

AREAS OF AGREEMENT:

Outcomes:

1. SWMPs will address means to minimize or eliminate the introduction of fertilizers, pesticides and herbicides into receiving waters.

Expectations:

1. SWMPs include a plan and a schedule for adoption and implementation of interdepartmental policies or specifications for use of herbicides, pesticides, and fertilizers aimed at minimizing water quality impacts.

2. Permittees will evaluate existing educational measures and implement additional educational measures for the general public and commercial applicators where necessary.

Problems/Constraints:

1. Permittees have limited authority over pesticide and herbicide control, e.g., the Department of Agriculture (DOA) regulates applications by municipal and commercial applicators. DOA's regulations also affect the education, training, and certification of applicators.

2. Conflicting objectives between public safety and water quality concerns present obstacles to minimizing the use of herbicides and pesticides.

S7.B.8.g. ILLICIT DISCHARGES

AREAS OF AGREEMENT:

Outcomes:

1. Permittees will identify and prevent or eliminate illicit connections and reduce the incidence of improper disposal and spills into the municipal separate storm sewers.

Expectations:

1. Permittees will conduct an ongoing program, including inspection activities, to identify and prevent or remove illicit connections during the term of the permit.

2. Permittees will develop procedures to coordinate with spill response agencies.

3. Permittees will adopt and implement guidelines and procedures equivalent to those in Volume IV of Ecology's stormwater management manual for the storage and containment of materials.

4. Permittees may integrate field screening activities with existing programs, for example, pretreatment inspections.

S7.B.8.h. INDUSTRIAL STORMWATER POLLUTION REDUCTION

AREAS OF AGREEMENT:

Outcomes:

1. SWMPs will seek to minimize the pollutant loadings and receiving environment impacts from industrial facilities.

Expectations:

1. 4.SWMPs will include an element intended to minimize impacts from industrial facilities; programs should include an inventory of industries, or a process to develop and maintain an inventory of industries, that discharge into the municipal systems. SWMPs will include a process to update the inventory and provide industries with instruction in compliance with the local stormwater management requirements. Permittees will notify Ecology when they are aware of industries that may require permit coverage by Ecology.

2. 5.Some permittees do not anticipate monitoring discharges from industry to be a priority in the first permit cycle.

3. 6.SWMPs will describe existing mechanisms to ensure industry compliance with local stormwater management ordinances. If no mechanisms currently exist, the SWMP will propose a process and schedule to develop them.

4. 7.Municipalities will refer stormwater pollution problems associated with industrial (non-construction) NPDES permittees to Ecology unless the permittee has local ordinances that impose stricter stormwater management standards than imposed through the permit issued by Ecology. Negotiation between municipal permittees and Ecology on responsibilities in dealing with an industry regulated by both the municipality and Ecology is expected to occur during the first permit cycle.

5. 8.Unless otherwise agreed to by the permittee, a permittee will not be expected to enforce an industrial NPDES permit issued by Ecology.

6. 9.Permittees will not be held liable by Ecology for water quality standard violations caused by industries covered under an NPDES permit issued by Ecology unless the permittee has stricter stormwater pollution control requirements than those imposed by Ecology and the permittee's requirements have not been enforced.

7. 10.Ecology intends to include as a permit condition in Industrial Stormwater Baseline General Permits and other industrial stormwater permits, the requirement that industries discharging to a municipal storm sewer system covered under an NPDES/state discharge permit comply with any applicable municipal codes and policies that impose stricter requirements for control of stormwater pollution than are imposed by the permit issued to the industry by Ecology.

Problems/Constraints:

1. Permittees lack authority to regulate discharges covered by the industrial NPDES permit

2. There are concerns over governmental entities having multiple layers of regulations over businesses.

S7.B.8.i. PUBLIC EDUCATION

AREAS OF AGREEMENT:

Outcomes:

1. Permittees will reduce pollution and other impacts of stormwater through education

Expectations:

1. SWMPs will include ongoing efforts to educate residents, businesses, industries and employees of the permittee.

2. The program requirement may be fulfilled, in part, by regional coordination.

Problems/Constraints:

1. It may be difficult to prove or assess success of education efforts of the SWMP, even though education may be one of the most effective long-term stormwater management practices.