

# Letter of intent (LOI)

Interested parties should submit a Letter of Intent (LOI) on or before February 28, 2023 for each individual proposal. Letter of intent should include applicant contact information and seven questions about proposed study. More details about SAM study selection process, eligibility and funding availability can be found in SAM REF guidelines in SAM Effectiveness webpage.

The respondent's email ([mindikellar@piercecountywa.gov](mailto:mindikellar@piercecountywa.gov)) was recorded on submission of this form.

## Applicant contact information

Applicant Full Name \*

Mindi Kellar

Organization \*

Pierce County

Phone number \*

253-798-4652

## Proposed Study Information

1. Proposed Study Title \*

Annual Report Questions for Improved Regional Learning and Permittee Efficiency

2. Which topic(s) from the SWG's priority list do you propose to address? \*

The proposed study topic should be in the SWG's priority list

Topic 14. Improve future Permit annual report questions for quantifying data for regional learning by analyzing Annual Report data, including analysis of narrative questions.

3. Select type of project being proposed \*

- Survey
- Literature Review & Synthesis
- Environmental Sampling Study
- Other

#### 4. Short Description of the Proposed Study \*

250 word limit: describe how results will assess effectiveness and advance regional understanding and permittees' implementation of specific stormwater management approaches

The purpose of this proposed Study is to improve annual report questions of the municipal stormwater permits. The need for improving some of the annual report questions was identified in a 2022 white paper\* by an Annual Reporting Ad Hoc permittee committee that provided input to Ecology on the 2024 permit reissuance process. Based on the 2022 white paper recommendations and from experience reporting and analyzing annual report data, some of the questions could be revised for better regional learning about stormwater pollution without increasing the effort by permittees to answer them.

We propose to review and quantify annual report data for the illicit discharge detection and elimination (IDDE) and Source Control (SC) permit sections, including analysis of narrative questions. This will allow an evaluation of the updated IDDE reporting schema and of reporting for the SC Program, which began for Phase II permittees in 2023. The evaluation would be done for one or two years of data (starting with 2023 annual reports), depending on when the study begins.

Interviews with Ecology permit writers will also be conducted about needs for regional learning and permit annual reporting. The interview outcomes will be used with the data analysis findings and the 2022 white paper recommendations to develop revised annual report questions for IDDE and SC. The revised questions will focus on simplifying data reporting to work better with permittee data management systems and to better support regional data analysis.

\*2022 white paper link: [https://scs-public.s3-us-gov-west-1.amazonaws.com/env\\_production/oid100/did200008/pid\\_201925/assets/merged/ji0bi4p\\_document.pdf?v=UCRPF7BYT](https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid100/did200008/pid_201925/assets/merged/ji0bi4p_document.pdf?v=UCRPF7BYT)

#### 5. What type information will be collected or analyzed for this proposed study? \*

If existing permittees' data are needed, specify the type, and the expected timing of a request for existing information from Permittees.

This Study will involve obtaining data from PARIS for specific annual report questions submitted from all permittees. No data requests will be made of permittees.

6. What are the anticipated measurable outcomes and key deliverables that will be produced by the proposed study, and how will they be used by Permittees and the Washington State Department of Ecology? \*

This study will provide a technical memorandum summarizing the results of annual report IDDE and Source Control data review and analysis, which will help understanding of regional IDDE and Source Control issues and concerns. Outcomes of the study will be a technical memorandum of the annual report data analysis and a white paper with suggested revised and improved annual report questions. The revised questions will be developed based on what we learn from the Ecology interviews, the data analysis, and recommendations in the 2022 white paper and will be reviewed by the study TAC.

The white paper will also include explanation and reasoning for the revised questions for Ecology to consider for future permit updates. Key messages, deliverables and outcomes from the Study will be shared with Ecology and municipal stormwater permittees. Communication of the project progress and results will include presentations at the Stormwater Work Group and permittees meetings, and a study schedule and factsheet will be prepared. The Study deliverables will be posted on the SAM website.

7. Permittees or agencies you are proposing to coordinate with (provide staff names and contact information, if known) \*

Enter "NA" if not applicable.

Pierce County will be the agency sponsor for this study. In addition, we have begun to reach out to other permittees and stakeholder to identify potential technical advisory committee (TAC) members. So far, we have interest and tentative TAC commitment by individuals from Snohomish County and King County, and we will continue to reach out to Phase II permittees and other stakeholder groups to gather diverse technical directions and advice for the study. In addition, we are teaming with a consultant who has experience as a SAM study technical lead to develop the proposal and implement the Study if approved.

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