

November 21, 2023

## Stormwater Workgroup

Abbey Stockwell  
Municipal Stormwater Permit Writer – Water Quality Program  
Washington State Department of Ecology  
P.O. Box 47696  
Olympia, WA 98504-7696

Dear Abbey,

The Stormwater Work Group (SWG) is comprised of representatives of a diverse set of stakeholders. This letter is the final product of discussions among the SWG's representatives of local, state, and federal government agencies, Tribes, and environmental groups. Organizations included in each of these groups are likely to submit their own individual letters. We are submitting this letter as a group that has listened to and considered others' concerns and perspectives and strived to reach consensus.

We appreciate the opportunity to comment on the formal draft municipal stormwater permit language for the 2024-2029 permit cycle. Our comments below are limited to the language Ecology has proposed for Special Condition S8 Monitoring and Assessment. We appreciate that Ecology included a section in the permit fact sheet describing SAM, its purpose, how it functions, and how SAM findings so far have influenced the permit.

The SWG agrees with the approach and specific permit language to support continued implementation of Stormwater Action Monitoring (SAM) receiving water status and trends monitoring, stormwater management effectiveness studies, and source identification projects. This "three-legged stool" of monitoring and assessment is needed to provide robust and meaningful adaptive management information for ongoing improvement of local governments' stormwater management programs (SWMPs) and activities, and of Ecology's permit requirements. The SWG supports and recognizes the importance of both local and regional monitoring programs to answer different questions. Our goal is to continue to learn from and leverage the various types of monitoring conducted throughout western Washington.

We appreciate that the proposed S8 permit language is quite similar to the current permit that was issued in 2018 and effective in 2019. We agree with most of the key changes proposed in the draft language and have these specific observations related to sections of permit language:

We agree that Eastern Washington Phase II permittees should have an option to participate in S8 – Monitoring and Assessment options similar to Western Washington permittees. Language in the Eastern Washington Phase II NPDES permit supports this as drafted.

We agree with continuing to include requirements in S8.B.3 that permittees provide data for SAM effectiveness studies. The requirement will help SAM provide permittees in turn with more meaningful findings, results, and recommendations on the permittees' highest priority study topics. We appreciate that the fact sheet language clarifies that the SWG, with a strong voice of permittees at the table, will approve any studies that might invoke this requirement. The SWG intends to oversee the timing, scope, and extent of each request to ensure this is a reasonable expectation and is limited to the types of information permittees are currently keeping records for to document their required SWMP activities.

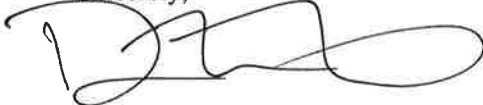
- The permit appropriately specifies that the request will come from the SAM Coordinator. Permittees would appreciate the permit specifying more detail about how and when such requests would be made and how the permit requirement would be fulfilled.

The SWG and our Effectiveness and Source Identification Subgroups will continue to do our utmost to have these data requests defined in the study proposals that come under consideration for our approval as SAM studies.

The SWG agrees with the payment amounts and timing for both S8.A and S8.B. Each permittee's annual payment preserves an adequate level of funding for each SAM component. Listing all the SAM payment amounts in the new, separate appendix is helpful for transparency.

Thank you again for this opportunity to comment on formal draft S8 Monitoring and Assessment language for the 2019-2024 municipal stormwater permits. The SWG appreciates Ecology's commitment to supporting SAM and continuing this innovative approach to permit-required monitoring with priorities and projects identified by our group of stakeholder representatives. If you have questions about these comments, please contact me at 425-452-7865.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don McQuilliams', written over a horizontal line.

Don McQuilliams  
Chair - Stormwater Workgroup