**Instructions:**

* This is a template for the Topic Group revision suggestion statements. Please use it to capture the Topic Groups suggestions. It does not need to be any more in depth than the examples provided, but can be if preferred.
* The royal blue text in this template are actions for the user. Follow the action and delete the royal blue text.
* The soft blue text is example language to provide the user with examples of suggested comment revisions. Delete the soft blue text and replace with the Topic Groups suggestions.
* ­­­­­­­­­­­­­­­­­­­Delete these instructions.

**List Topic Name Permit Suggestions**

**2024 Eastern Washington Phase II Municipal Stormwater Permit Reissue**

**Topic:** List the topic being reviewed

**Permit Section:** Identify the permit section(s) of the topic

**Topic Group Lead:** Identify the Topic Group Lead

**Regulatory Purpose –** *Ex:**Watershed Planning*

In this section, summarize the intent of the current permit section of the topic.

* + Ex: The purpose of the watershed planning permit requirement is the protection and restoration of the beneficial uses of our water bodies.
  + Ex: To meet this purpose, the requirement should generate a planning tool to guide and target capital actions (e.g., retrofits, facility improvements, restoration) and programmatic efforts (e.g., education and outreach, O&M, source control, land use planning, etc.) that support stormwater management efforts to achieve clean water and ecological function goals.

**Problem Statement(s)** *– Ex: Watershed Planning*

In this section, state the gap, unclear language, , unnecessary burden, etc. of the topic being reviewed.

* Ex: The current Phase I watershed planning requirement is too prescriptive in its approach to be applied more broadly. A better balance needs to be struck between prescription and flexibility.
* Ex: The price tag and resource commitment required under the current Phase I watershed planning requirement has proven a heavy lift and would is overly burdensome for smaller Phase II jurisdictions, in addition to being an unsustainable path forward for Phase I jurisdictions to continue to pursue.

**Permit Revision Suggestions**

In this section, break out the topic components and provide revision suggestions with pertinent details

Consider these questions when providing details:

* What are some permit conditions (topics) that could be improved to the benefit of a municipal program and/or the public?
* What gap is being closed, clarity is being provided, or issue is being resolved by the topic?
* How will the topic impact the budget of a municipal stormwater program?
* Does the topic have overlap with, or affect other programmatic permit conditions?
* What are the components or actions necessary for implementation of the topic?
* Are there examples of successes/failures of the topic being adopted elsewhere?

*Ex: Outcome-Based Watershed Permit Requirements*

* + Ex: The requirement should be reframed by its intended outcome: guide stormwater management investment and programs that contribute to healthy waterways.

*Ex: Increased Watershed Program Flexibility*

* + Ex: The diversity of watersheds and jurisdictional capacity and resources should lend to a more flexible and effective watershed planning requirement than what the current Phase I permit language allows.

*Ex: Watershed Assessment and Data Collection*

* + Ex: The permit requirement should be focused on a planning tool instead of data and modeling. Some data will be needed on watershed characteristics but the emphasis should be to determine what the Permittee thinks the waterbody needs from a stormwater management standpoint.

*Ex: Watershed Planning Process Transparency & Accountability*

* + Ex: Strong public review processes with opportunity for involvement and comment, in addition to accountability mechanisms, are not currently a condition of this permit requirement, however, they should be considered for inclusion into the permit requirements to ensure accountability, transparency, effectiveness, and compliance*.*

*Ex: Watershed Planning Guidance*

* + Ex: Permittee assistance in the form of standardized methodologies would benefit the permit goals and many municipalities required to implement watershed planning. The Department of Ecology should develop guidance/methodology to support/direct Permittee work to facilitate quality work products and provide consistency among regions.

*Ex: Watershed Planning Programmatic Overlap*

* Ex: Watershed planning requirements in the permit contain components that overlap with TMDL requirements for impaired water bodies. This can lead to repeated or redundant efforts to create similar deliverables for separate permit conditions. In lieu of separately having to report the same or similar data under separate programs, the TMDL requirements in the permit should have a provision that allows applicable permittees to demonstrate compliance in concert with the watershed planning requirements to allow for efficient use of resources and streamlining of reporting.