Definitions:
> IDDE – Illicit Discharge Detection and Elimination (programmatic permit requirement)
> S8.D – the permit Monitoring and Assessment section on regional Source Identification

Context: SWG's June 2016 recommendations to Ecology on S8.D

Retain a reduced scope and budget for S8.D that is focused on using source identification and diagnostic monitoring data to move from anecdotes to data to set priorities on reducing sources of stormwater pollution, and to identify the best ways to solve (fix/reduce/eliminate) these problems.
   a. Use the S8.D funds for ongoing analysis and reporting on sources of pollution, including changes over time in types of sources; geographic distribution; and frequency.
   b. The amount of funding needed to do this in the next permit cycle should be determined through the analyses conducted during the remainder of this current permit cycle. In the next permit cycle, maintain only the minimum S8.D funding level needed to conduct the ongoing analyses.

Purpose of this work:

Purpose of S8.D Monitoring and Assessment Source Identification and Diagnostic Monitoring:
* to get a regional perspective, improve coordination among jurisdictions, share resources and techniques that are effective, create regional approaches to address common problems
Purpose of SWG Source ID Subgroup:
* to inform source control efforts and effectiveness studies, define the best approach to consistent and efficient reporting in the future, recommend how remaining S8.D funds should be spent
Purpose of IDDE Reporting Form:
* defines the information to be submitted for Ph II Q20/Ph I Q48 in permittees' annual reports

Recommendations for how remaining S8.D funds should be spent
1. Do not use S8.D funds to analyze the 2015 or 2016 data. We are likely not getting substantially better data than we did in 2014.
2. Create a form to support consistent data reporting and to answer as many relevant annual report questions as possible (see draft IDDE reporting form).
   a. Discussions are underway as to how/whether to create a form in Ecology's Water Quality web portal that is auto-populated with relevant ERTS entries; or whether something external is preferable.
   b. Larger permittees, or those with more than about 40 incidents per year, will likely prefer to export information from their own databases.
3. Fund one or more source identification studies prioritized by the Subgroup and approved by the SWG.
   a. One proposal under consideration would use water quality or solids data to identify hot spots and prioritize source identification efforts on a watershed basis.
   b. Other proposals to build on Herrera's field manual might also be considered.
4. Roll over remaining funds to the next permit cycle to support future analyses.

Recommendations for future IDDE data analyses (next permit cycle)
5. If the permit is reissued on time in mid-2018, the next analysis will be on the 2019 data submitted in 2020 annual reports.
6. Include spatial analysis of the data.
7. Conduct and report out on the analysis annually after 2020.
   a. It will be a substantially reduced level of effort compared to the analysis of the 2014 data because the data submittal will be uniform.
8. Do not collect additional funds for S8.D in the next permit. The rolled over remaining funds from this permit cycle will be sufficient to conduct the annual analyses if the permittees are required to submit consistent data in the required format.