

# Stormwater Program Review

## Focus Group Notes

Name: Don Jakes (presenter & host); Kris Van Amber (facilitator); Darryl Weakley, Don Jakes (themes); Mary Lynn (note taker)

Date: 10/09/07

Time: 1:00 – 3:00

Location: MPCA, St. Paul

Attendees: ISW, internal

- Marni Karnowski
- Zach Chamberlain
- Myrna Halbach
- Mike Tibbets
- Jim Warner
- Deb Olson
- Cindi Kahrman
- Duane Duncanson
- Ken Moon
- Jeff Connell
- Scot Sokola
- Phyllis Strong
- Leslie Goldsmith

\*Note taker: Please write down common themes that you hear. We don't want you to transcribe the conversation.

1. React to this vision statement about stormwater management. It is apparent from the statement it will take all of our efforts to accomplish.
  - It's unachievable, not realistic.
  - Impractical to say "all" stormwater.
  - All including agricultural runoff?
  - What is high quality, reasonable volume? What does it mean?
  - Sheer number of sites regulated by Agency – unattainability.
  - OK for vision/goal to be broad, then build in specificity.
  - Link to Agency Strategic Plan.
  - Recognize that vision can set you up for failure in some eyes.
  - Does not seem visionary, seems like an outcome of management structure.
2. As you consider stormwater management in Minnesota, what is going well that you wouldn't want to change/lose?
  - Good to have someone (Ken) in leadership in the ISW program that has history in the Agency stormwater programs.
  - ISW effort is becoming more cohesive.
  - Leveraging partnerships (e.g. CSW joint partnerships, SSC,...)

- Clear measures and data to analyze – good progress made in CSW, can happen in ISW.
  - More awareness around nonpoint sources.
  - Don't lose sight of those who are and have been complying with the stormwater program.
3. What currently is not working the way you would like or what issues/opportunities do you see?
- ISW task is huge; need more resources.
  - Resources are there; how to use them well (e.g. combined wastewater/stormwater inspections).
  - General permit implies everyone must be regulated.
  - Manage some sources through EPA's environmental results program.
  - Larger facilities are better compliers; they have more resources.
  - Current data is not good.
  - Need to share data for ISW (when we get it).
  - General permits not designed for nondegradation, TMDLs
  - General permit implementation would be more doable if "rolled out" on a sector basis; prioritize sectors based on risk.
  - Need unifying purpose for stormwater and other water programs across the Agency.
  - If industry already covered under another permit (e.g. air, wastewater); then re-consider why coverage under a general permit is needed. Multi-sector permits.
  - Don't "know" what ISW program is – what is our direction.
  - Need communication and how to sell program to Legislature, others.
  - Why not permit-by-rule? (instead of general permits).
  - Why not a stormwater section? (MS4, CSW, ISW).
  - Need flexibility at federal level.
  - Need to be able to measure BMP effectiveness; quantifiable reductions.
  - Quantify loading from contributors (e.g TMDL program).
  - Need to look beyond BMPs and assumptions about them.
  - ISW becomes dumping ground for other problems (e.g. used oil dumped on ground, when it rains it becomes a stormwater issue – when in fact it was not properly managed in the first place).
  - Need to figure out how to manage stormwater across the Agency and across stormwater programs – integrated approach.
  - Need defined set of strategies.
  - Partnerships break-down at local level when noncompliance is huge - Agency becomes over-whelmed with enforcement.
  - Who should lead?
  - Change behaviors and how we look at how pollution happens; consider LID.
  - TMDL/impaired waters – addressing these issues is not as complicated for ISW and industrial facilities as it is for MS4s and construction. Agency has ability to react quicker because industrial facilities are known and identifiable. More difficult to address in the aggregate.

4. What didn't we ask you that you want to tell us? (What one thing to leave us with?)
- Make sure we collect the right kind of data to achieve goals.
  - Need to think more strategically about compliance, prioritize and plan (needed due to large volume of ISW sources).
  - ISW program is isolated compared to other stormwater programs (MS4, CSW).
  - Make sure ISW program grows, and program is evaluated.
  - Need to set priorities, and have support, for work needed to implement ISW general permit program.
  - Determine what highest risk is and where to put resources.
  - ISW program design, try new ways and processes.
  - Pollution prevention in ISW.
  - Do not design program that brings in all regulated parties at one time – determine risk to prioritize.
  - Stormwater is a problem because of our land use choices; work with planning/zoning; use LID concepts.
  - Education and public relation plan needed for ISW permit implementation.