

2/23/17: W.WA Municipal Stormwater Permit Reissuance public meeting– Lynnwood

In attendance

Participants: In-person per sign-in sheet: 55

Compilation of notes on topics – *the following has been summarized and paraphrased for length. See meeting agenda, and presentation for additional context.*

Watershed-scale Stormwater Planning

What are different ways that Permittees could potentially use prioritized watershed/drainage basins to help inform SWMP implementation? [capital projects, education and outreach, source control, etc.]

- Yes, to all of those with retrofit needs as a priority, plus motivates filling data gaps on overall health of watershed and the added benefit at breaking down silos in local government by inspiring coordination between land-use related department as well as coordination across jurisdictions to plan around ecological boundaries, rather than political boundaries.
- This commenter suggests it be called “Jurisdictional Basin” and not “Watershed-scale”. O&M activities, land use planning, long-range planning. Other commenter suggested “Catchment Area” or “Retrofit Plan”.
- Programmatic solutions (O&M) – reinforce, economy of scale & coordination – see how it could strengthen inter-jurisdictional but don’t mandate
- How many? What does your plan look like – LID tool kit as an example. Grant-Capacity eligible, Guidelines for data collection, jurisdiction boundaries don’t match watersheds.

What are some potential data gaps to developing this plan?

- Lots of data gaps, WQ and flows at local streams systems (SWMM) and land cover (including BSI) human influences on where the water goes (not just following topography now with all our pipes).
- Resource gap = City council support/approval, personnel resources. Jurisdictional boundaries & watershed/basin boundaries aren’t the same.
- Structural Retrofits – has to be able to be met TMDL, Basin Planning, etc.
- Need consistent and specific guidelines or: types of data to collect. Define “desired” data set. Recognize not all permittees collect some data and that modeling would only be option.
- Pick one guidance for regional consistency.
- Clarification on permit needed, size, scope, scale, money, modeling, how prioritize TMDL, superfund, condition of assets?

What guidance or resources would you like to see provided and why?

- The resources listed help to prioritize water needs, however a new state resource is needed to guide development of a watershed plan and anticipated outcomes. A similar handout to the LID code update handbook would be useful. While efforts began before 2018 permit that could

qualify as watershed planning – and this work could be built off of in the 2018 permit requirements – watershed planning should be understood as a long term, adaptive process that is never truly complete. So priority efforts won't allow permittees to check off a box, only the ability to continue to build at that work.

- Guidance on what our goal should be. What is the deadline for our project list? Grant Funds.
- Use already developed basin plans/prioritization, a toolkit/one guidance document, what is the period/range
- What does a watershed plan look like? Something like the LID toolkit (people liked this tool)? Concern that there exists 3 parallel guidance documents. How to bring in non-stormwater factors/impacts to water quality. Is it a treatment across all?
- Watershed Management Areas (defined in Bothell's storm master plan) – based largely on sub-basins, but flexibility for geography barriers like freeways or land use. Credit for prior effort. Clear phases, not one huge deadline at the end. Planning period 5, 10, 15, 20-yr plan? Jurisdictional boundaries don't match basins (how plans match or are scalable per jurisdiction size). Min/max size of area/effort proportional to jurisdiction size or population. Some jurisdictions are one basin, some have 12+.
- 5 year vs 20 year plan, plan doesn't end @ jurisdiction boundaries, definition of watershed, catchment, Intent- what is it?
- Funding for source control education
- What does a WS plan look like, what is period of range of plan, capital vs operations. This is not watershed planning. Watershed scale planning is too broad of scope to implement. This is basin/sub-basin scale retrofit planning. Please label it correctly. Please identify purpose/intent and benefit of this requirement.
- Definitions, objectives, intent, and one guidance document.

Business Inspection Source Control Program for Phase II

Do you see value in adding a business inspection source control program to Phase II city and county stormwater management programs? Please elaborate.

- Yes, but considerations should be made if for the same types of business and same strength of enforcement. Also the 20% inspection rate annually should be adding up to 100% by end of 5-yr permit. Should still link w/IDDE.
- No, what is found is minor, trash dumpsters, wash buckets. Other agencies are covering this topic. Health Department, Hazardous Ecology Program. Useful – see's value. Spill kit program works well. "Heart" ECOS.
- Yes, but lacking the resources. Yes - WQ improvements offset IDDE inspections, & Ed & outreach requirements.
- Yes, but there are real challenges of making this workable w/making it too specialized. Small jurisdictions would spend a lot of time in training for a small piece of effort.
- Inspections per population instead of % of businesses? Some jurisdictions have a larger burden than others. Replace field screening with voluntary non-enforcement source control programs – technical assistance.
- Yes, stopping issues before they go downstream is cheaper and this is where we find issues – not dry weather screening

What changes, if any, to Phase II jurisdictions' local codes must be made in order to ensure local authority to require the use of stormwater pollution prevention BMPs at existing businesses? How much time would that take?

- Adding Required BMPs, Adding enforcement mechanisms, Adding structural change requirements
- Training program for staff required to implement program, add required BMPs for certain types of businesses- codified, add enforcement mechanisms, add authority to go on-site, requiring structural changes, mobile businesses
- Right to access for inspections requirement, clear BMPs by industry type.
- Adding specific language to code that is consistent across the permittees.

How would you develop an inventory of potentially pollutant generating commercial properties and/or businesses in your jurisdiction?

- Mobile businesses
- Parcel use, Business licenses, NAICs code list
- Health districts & business licenses
- Consult with Phase Is on their approach

What guidance or resources would you like to see provided and why?

- Use lessons from Phase I experience and local source control groups. ECOS has valuable insight after being contracted to do this work by multiple jurisdictions.
- Financial assistance to meet requirements (Like King County), Checklists (utilize LSC checklist), Get example codes/lessons learned, BMPs by industry, How small do you go? Home businesses?
- Please phase in. This will be a big lift for small jurisdictions.
- Municipal inspector training programs- huge need! Language gaps create challenges to communication at certain businesses.
- Need standard code language
- How to develop inventory – parcel use
- Checklists already in use – each industry different BMPs
- Need clarification around home based business vs commercial
- Department of Revenue – not the best business list

Outfall Reporting Standard Discussion

- Spatial data in lieu of tabular? What forms will be acceptable; ESRI, AutoCad, Shape file?
- How will info be used? What is the benefit – environmental benefit? PARIS – discharge points (transparency) public availability – permitted outfalls no MS4s currently included.
- NHD problems – not accurate everywhere. Lat/Long more accurate than NHD.
- Concern with redundancy.
- How frequently will outfall need to be reported?

O & M Standards Discussion

- Proactive sweeping & culvert box maintenance should mean we don't have to inspect vaults annually. Maybe a trade-off. Preventive maintenance counts.
- Still waiting to get enough data to reduce frequency - can we use regional data not just local?.
- Need more incentive to clean lines not just CBs.
- Prioritize functional maintenance.
- Function critical maintenance to meet target vs. aesthetic or other O&M
- Inspecting lines is a higher priority than cleaning lines.
- 100% target for maintenance: reduce so no G20 needed
- Remember equivalency process in making SWMMWW changes
- Take care about how much adding in permit cycle!
- King County would like to see maintenance standard to review before formal review. Would ease manual equiv.
- Sweeping and Line Cleaning – Studies are in urban areas not in rural areas.

SMMWW (Manual) Usability and Enhancement Discussion

- Consider putting all BMPs in one chapter with a description of the minimum requirements met at the beginning of each BMP.
- More guidance on groundwater mounding/assessments
- Consolidate infeasibility criteria (v. design criteria); Infeasibility criteria in a single matrix.
- Clarify turf/ballfields – need treatment?
- Infiltration testing – are alternate methods allowed – clarify
- Alternate to pit testing – other tests are acceptable

Open Floor Discussion

- Last permit had big changes – content will still be implementing – not done
- Phase long-term goals over several cycles
- Specific topic forum meetings on new permit requirements?
- Would like a broader LID discussion.
- Public ED&O/IDDE conversations coming?
- ECY capacity a concern
- Keep in mind that current permit was a big lift and so be careful w/new requirements and timing
- WA is ahead of other states & we can reach goals over multiple Permit cycles
- Revise the annual report questions and tie them to permit requirements.
- Some jurisdictions, are on a 2 year budget cycle and need time to plan & budget for any new programs
- Want vesting language in next permit to provide certainty