

Reissuance of the Phase I and Western Washington Phase II Municipal Stormwater Permits (Permits)

Introduction to a proposed approach for long-term municipal stormwater planning

December 11, 2017

1:00 – 3:00

Rhodes Center, Tacoma

Summary Q&A – *the following is a summary of questions and answers from this introductory session regarding Ecology’s proposed concept for “long-term MS4 planning.”*

To understand the context of the questions below, we recommend that you [read the associated long-term MS4 planning document before you keep reading.](#)

[Comments on the draft document are due by 11:59 p.m. February 2, 2018 and can be submitted here.](#)

Q and A related to watershed inventory

1. Some jurisdictions have already developed basin plans. Do they need to start over? Or can they build off of those?
 - a. We want jurisdictions to be able to build off of existing work [See long-term planning document page 2, line 39].
2. If you only have 10% of a watershed in your permit coverage area, how does that work?
 - a. We encourage permittees to work together, but we don’t require coordination. [See long-term planning document page 4, line 5]
3. Is Ecology expecting jurisdictions to do planning for areas outside their jurisdiction?
 - a. No, only within permit coverage areas. [See long-term planning document page 3, line 33]
4. What do you do if you don’t have much existing information on catchment basins?
 - a. Work from existing information and identify data gaps. [See long-term planning document page 4, line 10]. Identify what you would need to complete the assessment and ways to address needed information (e.g. you can find information through a literature search, other sources of information, develop a plan to collect data, make a reasonable assumption and plan a way to assess that assumption over time). The [Building Cities in the Rain guidance](#) provides a number of sources of information that may be helpful. [See long-term planning document page 2, line 27]
5. Any limitations on how old data can be for the watershed inventory?
 - a. The long-term planning document does not provide data specifications. The expectation is that the jurisdiction will provide supportable, defensible data to identify and

characterize basins. [See long-term planning document page 3, line 26]. Please comment on what level of data is useful.

6. Are you creating guidance to accompany permit requirements?
 - a. Yes, we will prepare guidance. It will likely be in the SWMMWW. Please provide comments on what type of guidance would be helpful.
7. Process and opportunity to comment on guidance?
 - a. This long-term MS4 planning approach is at the Draft stage. Once we receive comments on the Draft (due by February 2nd), we'll prepare formal draft permit language and supporting guidance. Formal drafts for the Permits and Manual will be available to comment on in summer 2018.
8. What type of timeline are you looking at as to when this will come into effect?
 - a. The long-term planning document has several places where timelines have been left open-ended at this stage of development. [See long-term planning document page 4, line 12 and line 28]. We would be interested to hear comments on the proposed timeline.
9. Problems of scale among jurisdictions, and scale driving priorities.
 - a. Scale the effort so smaller jurisdictions should have fewer basins to collect information about. Basins of 1-10 sq. mi are the sizes that research has shown are appropriate for stormwater strategies. [See long-term planning document page 3, line 33].
10. Clarify the scale of receiving waters with 1-10 sq. mile area?
 - a. Direct discharge areas to the Sound may be handled differently. The focus of this exercise is not on larger rivers, or where the contributing area to the receiving water is larger than 10 sq. mi. It is instead focused on the tributary networks to larger rivers. If a direct discharge is to the Sound, consider the condition of the beaches and surrounding area. Some receiving waters will include lakes rather than creeks. Accordingly, the information for the lake areas may be prioritized in a different manner. We welcome comments on how the different types of receiving waters (e.g. tributaries, creeks, small rivers, lakes and Puget Sound) should be addressed as the permit language and the supporting guidance documents are developed.

Q and A related to basin prioritization

1. Is the intent to prioritize everything? What is the scale of this effort? Top 5?
 - a. The intent is to identify and characterize every 1-10 sq. mi basin where more than 10% of that basin is contained within your permit coverage area [See long-term planning document page 4, line 5].
2. Can you group prioritization if there's a large number of basins?
 - a. Please comment. The long-term planning document does talk about grouping similar basins, but please comment about what's meaningful for implementation in your jurisdiction. [See long-term planning document page 4, line 14]
3. Are there single priority lists, or multiple priority lists?
 - a. Please comment. Short term vs. long term goals could be separate priority lists. [See long-term planning document page 5, line 10]
4. Include seasonal (ephemeral) streams in the survey?
 - a. Perennial streams only. [See long-term planning document page 3, line 3]

5. At the county level, there may be several jurisdictions asking to coordinate with the County. How will this work?
 - a. Ecology is open to how this coordination is structured. It could be through inter-local agreements, coordinated partnerships or other means acceptable to the jurisdictions. [See long-term planning document page 4, line 6]. Note that the framework does not require coordination, but it is an option. Please provide comment on constraints and time needs.
6. If we prioritize sub-watersheds, will all these jurisdictions qualify for the Stormwater Control Transfer Program?
 - a. Still considering those distinct programs, but there is a lot of overlap. Ecology requires review and approval of the Stormwater Control Transfer Program, review and approval is not being considered for the proposed long-term MS4 planning.
7. Where to find guidance on Environmental Justice (EJ)?
 - a. [EPA has an EJ mapping tool](#) that is referenced in the Building Cities in the Rain guidance. [See long-term planning document page 2, line 27]
8. How does prioritization interact with TMDL requirements? Seems to de-prioritize areas TMDLs are working in.
 - a. The objectives of TMDLs may be different than the objectives of this long-term MS4 planning approach. Building Cities in the Rain and the Stormwater Control Transfer Program discuss how TMDLs can interact within the prioritization process. [See long-term planning document page 2, line 27]
9. All of my watersheds have TMDLs. What should this exercise look like for my jurisdiction?
 - a. This exercise will look different for built-out cities than for smaller, less developed jurisdictions. Please consider commenting on your situation, and how this may work from your jurisdiction's perspective.

Q and A related to catchment planning

1. How is catchment defined?
 - a. The long-term planning document points to catchment as areas up to 600 acres in size within the priority basin. [See long-term planning document 3, line 18].
2. What if the priority catchment within the priority basin is outside our jurisdiction?
 - a. This may create an opportunity to coordinate on needed actions, but may not be the priority area to focus on for this permit requirement.
3. Non-stormwater management actions as part of the plan?
 - a. That can be a consideration. Often plans have more than one purpose. Work with existing plans. The actions identified in this long-term planning exercise can inform comprehensive planning efforts including where to accommodate future growth.