

## 3/14/17: W.WA Municipal Stormwater Permit Reissuance public meeting– Vancouver

### In attendance

**Participants:** In-person: 26

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

#### General Comments:

- On the right track with less modeling requirements
- Possible to do without much planning beyond retrofit areas

#### *Do you see value in developing a watershed-scale stormwater plan to inform your SW Program?*

- Yes, however, implementation must be balanced. Need to provide credits for larger scale improvements
- Yes – there is value at obtaining information on how prioritized investments in O&M, retrofits and education and outreach can help improve WQ conditions and designated uses – But, at a level that is relevant to the MS4 Program
- There is value if done correctly and in a way that does not create undo economic hardship
  - Redevelopment credits, incentives would help
  - There would be adverse impacts if used to restrict development of urban growth boundary
- Already do this to a certain extent
- Can see value in being proactive
- Yes, interaction between jurisdictions could be more efficient in use of resources; target prioritization; customization per watershed; tangible for the public to grasp (smaller watersheds vs Columbia)
- Depends on how the data is used –
  - New development is already subject to stringent rules; in impaired watershed, existing development is typically the problem;
  - Could have benefits for focusing on where to spend money
- Retrofit incentive but unfunded

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

- Capital projects/retrofits; education – by watershed/neighborhood/land use type; O&M program optimization (e.g. street sweeping, catch basin cleaning); source control – business inspections

- Focus education and outreach to the polluters (industrial permittees); concrete delivery; mobile cleaners

*What are some potential data gaps to developing this plan?*

- Baseline WQ conditions/data (includes biological)
- Southwest region watershed model
- Costs for implementation
- Mapping data may vary dramatically based on population; monitoring?
- Balance competing needs and interests; cost-benefit analysis
- Population density
- Data needed to demonstrate where prioritization should focus

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

- Guidance on methods and tools;
- Case studies
- Scaling
- Special conditions of certain locations (e.g. Longview);
- Funding
- What's expected?
  - Resolutions between jurisdictions - who's responsible for what?
  - What's enforceable?

## 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.*

- Depends on enforcement; focus on education and incentives; needs reasonable targets and standards; significant benefits on funds – low hanging fruit
- Yes, addresses gaps with health and stormwater enforcement
- Concern of overreach of source control inspection
  - Redundant inspections from industrial permit, health, and source control

*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?*

- Add authority to enter property, add authority to require BMPs; 2 years to include public involvement and city council.
- Begin with education and outreach to existing businesses, followed by code updates
- Add police power to address illicit /non-sw discharges and use BMPs; legal access issues legal access issues

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

- Start with the Fire Dept., they have a list of hazardous sites; ID businesses in impaired watersheds

- Business licenses; leave out industrial permittees
- Location – close to streams, high groundwater; business uses; existing SW facilities in use on site
- Prior experience, licensing, and GIS
- Utility bills; parcel data; site visit inventory

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

- Education/training, incentives, and funding
- Need for business spill plan templates
- More source control BMP guidance
- Local Source Control support for permittees
- Issue guidance before permit is issued

### Outfall Reporting

- Known outfall locations would require GIS exercise to assign NHD data to outfalls
- Not all outfall maps are currently in GIS
  - May be a heavy lift for municipalities that don't already have outfalls mapped in GIS
  - Phased approach would help, required for new outfalls as they are installed.
- NHD data itself is not the most accurate
- Improves capacity for municipalities to handle public records requests
- What is the timeframe? Just new outfalls, all known?

### O&M Standards

- Possible to fail 90% of SW facilities when doing inspections if someone were to try hard at it
  - 1 year of inspections can create 2 years of work
  - What are the priorities for municipalities' public works dept.?
  - Flexibility is warranted for maintenance response
  - Tracking is also a challenge
  - When using capital inspection staff, calendar years don't align with permit
- Vacuum sweepers become ineffective in wet months of year
- Concern over future maintenance requirements with permeable pavement
- Fix discrepancy between defects and fully functional
  - Criteria for labeling a facility as fully functional, even if defects are detected and acknowledged
  - Need to establish criteria for determining functionality
- Avoid opinion based definition of function vs form (i.e. individual inspector determination)
- Need for quality external training (some concerns for the existing external training)
- Maintenance and inspection needs
  - Concern with some trainings available – informal, and/or in-house training typically performed
  - It would be beneficial to have training programs provided by ECY
- Past street sweeping performed for aesthetics, need data to justify adding it to the SW program because of costs
  - Focus on high ADT/bike traffic areas

- High equipment costs, breaks down, need to rotational equipment stock – which is costly
- Street sweeping requires extensive coordination between crew for street maintenance and water quality needs
- Staffing issues – SW program pays DOT
- Difference between public and private asset mgt.
  - More structure on private side
  - Work orders not applied to private sector

### SWMMWW

- Is it possible to include a SWPPP template for businesses tied to the source control requirement? Similar to the industrial SWPPP template but scaled for small businesses or commercial facilities
- Struggle with groundwater monitoring analysis and closed depression analysis
  - Improve content and expand guidance
- Clarify change with bioretention requirements for meeting requirements
  - Separate bioretention BMPs into separate BMPs, based on functionality
  - Currently requires advice of engineers
  - Clarify and group based on LID and treatment
  - Some duplication may actually be beneficial for manual end user
- Look at Clark County's Manual for how they have structured the combined code and manual guidance.
- The wetland guidance is not working
  - "Fail" criteria are unforgiving
  - Want to improve how to show wetland is presumptively protected
  - Improve the model-ability and practicality of requirement
- Could the source control section look at SWPPP and outline the elements to include
- Groundwater modeling and closed depression analyses are challenging
  - Need data/modeling/hydro expertise
  - Use/look to King County's guidance from their equivalent manual