Comments

Stormwater Workgroup Meeting, December 20, 2013

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Comments on 11/18 Meeting Notes:

Comment on "*Getting on the Same Page with LID*" (page 2 of November Meeting Summary) - It was my understanding that we came to an understanding that the best option was to go with the established definitions within the updated west and east side Permits and LID Manuals. So when the "*What is LID?*" question is asked, the answer is -- as defined within the west and east side LID manuals.

There are a various reasons that this makes sense, including;

- The existing Permits and LID manuals have been through an extensive public review process.
- BMPs within the established LID Manuals (west and east sides) relates directly to the established definitions.
- Reopening the discussion to redefine LID could compromise the integrity of the LID manuals.

Comment on "*Non-stormwater related portions of projects*" (page 3 of November Meeting Summary) - Where it's stated, "*Items such as….. trees should not be eligible*" -- this is not consistent with the west and east side LID manuals that define trees as an LID bmp, making them grant eligible if utilized as an LID bmp within the project. In addition, trees and shrubs can be utilized within bioretention, an LID bmp.

Comments on Grant Application Review Process

Comments on Question *3. Severity of Stormwater Quality or Hydrologic Problem and Expected Improvements.* - No changes to this question are proposed, but an additional bullet under 3 would allow grants proposing source control greater standing. The proposed bullet… "If stormwater source control project is proposed, describe the area, drainage way, watershed and/or water body being protected."

Supporting comments: Although the size of the area being treated is important, especially when the project is a downstream of the source or near a discharge point. It may also make sense to provide equal credit to protect a waterbody by reducing or preventing stormwater pollution at or near the source(s) of the pollution. This philosophy encourages LID's ability to address source control (when and where appropriate). In support, the Eastern WA LID Guidance Manual states the following:

> *"Low Impact Development (LID) is an approach to land development (or re-development) that works with nature to manage stormwater as close to its source as possible. LID employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resource rather than a waste product… Employed on a broad scale, LID can help maintain or restore a watershed's hydrologic and ecological functions."*

Comments on Question *5. Technical Planning Process*. Describing the "***technical* planning process"**, makes sense in essence. However, there is no universal definition for "technical planning", resulting in varying interpretations and varying responses. This is further complicated by varying interpretations and scores from grant evaluators. In addition, this question may provide an unfair advantage to medium to large communities that have more resources, planning capability and staff, over a smaller community with less of the same.

One part of the solution may be to eliminate the word "technical" and just ask for the "planning process". Remembering here that it's important to arrive at a project through a describable planning process, however, it is more important to fund projects that solve water quality problems and will have a positive environmental outcome.

A second part of the solution may be to eliminate a definite 50 point allocation for "basin wide or project modeling". Modeling on the eastside is not a requirement within the Permit as it is on the west side of the state -- therefore not always necessary or done. Allowing points for modeling creates an unfair advantage for the westside as well as for medium to large jurisdictions compared to small jurisdictions. The goal within the grant application review process is to resolve important water quality problems, recognizing the importance of all waters of the state, while striving for fairness for all jurisdictions regardless of size.