

## **Discussion Topics and Key Questions for IAC Meeting #3**

### **PERMIT FRAMEWORK**

*Please refer to the revised permit framework document.*

### **Reissued Municipal Stormwater NPDES Permit Requirement**

Discussion Questions:

1. Do you agree with Ecology's proposed approach to apply hydrologic performance standard(s) to new development and a standardized evaluation process similar to that proposed by Seattle Public Utilities for redevelopment projects and small sites (less than 10,000 sq. ft impervious; 5,000 sq. ft. PGIS; or  $\frac{3}{4}$  acres disturbance)?
2. Should a standardized evaluation process also be used in urban infill types of new development? Consider three categories of new development: greenfield development outside of UGAs, urban infill on small lots, and urban infill on larger parcels?
  - a. Is there an appropriate size to differentiate between small and large urban infill sites?
  - b. For urban infill on larger parcels, should achievement of a hydrologic performance standard be considered feasible even if the local government has to change the allowed housing type to make the achievement possible? (e.g., An original single family residential density of 10 homes/acre on till has to change to multi-family to achieve the performance standard and maintain same housing density per gross acre.)

### **Compliance Schedules**

*Please refer to the attachment to this document: Examples of Codes and Rules that Could be Revised to Implement & Require LID Techniques & Principles at the Site and Subdivision Scales.*

Discussion Questions:

3. Is a 2-year timeline for Phase I achievable? If not, what are the reasons for a delay, and what is an alternative preferred timeline?
4. Is a 3-year timeline for Phase II a reasonable timeline? If not, what are the reasons for a delay, and what is an alternative preferred timeline?

## **PERFORMANCE STANDARD MODELING RESULTS**

### Discussion Questions:

5. The two performance standards under consideration (match historic volumes or match historic flow durations in the 1% to 10% frequency range) can be met without the use of LID at project sites with outwash soils. Should use of LID be required at those sites anyway?

## **FEASIBILITY CONSTRAINTS**

The PCHB Ruling requires a permitting process that requires LID for stormwater management “where feasible”. The proposed Permit Framework allows for off-ramps and other avenues of compliance when preferred LID techniques are determined infeasible. The following questions are intended to facilitate discussion on what should or shouldn’t be allowed as a feasibility-based off ramp and what impact that has on additional LID requirements.

### **Infiltration Rates**

*Please refer to the summary of modeling results.*

### Discussion Questions:

6. Where soil infiltration rates are very low, is it feasible to mandate green roofs and/or rainwater harvesting - to meet the performance standard or to satisfy a required site evaluation process?
7. Should the permits require that on low infiltration rate sites developers do as much LID as feasible?

### **Competing Needs Feasibility**

### Discussion Questions:

8. Do you agree that there are times in which competing needs for space (i.e., not related to stormwater) can make an LID technique or principle not feasible? Examples identified in the APWA text include: pedestrian and vehicle mobility, and housing unit demands. Examples identified by the November edition of the proposed Seattle Public Utilities Director’s rule (2009-007) include: historical designation, pedestrian access, usable open space.
9. Should the decision about deferring compliance with stormwater LID requirements due to a competing demand be left to the local government on a case-by-case basis? Or, should there be an attempt made to develop more defined guidance for instances where deferring to another demand is acceptable?

**Cost Feasibility**

## Discussion Questions:

10. Relative to redevelopment: Do you agree that cost should routinely be considered in redevelopment projects on the premise that we want to encourage redevelopment in preference to new development, but we still want to achieve some improvement in stormwater management at these sites?
11. Do you have a suggestion for a generic cost threshold for limiting the application of LID at redevelopment sites? e.g., the cost of implementing LID strategies should not exceed 10% of the total redevelopment project cost.
12. Should the decision about deferring compliance with stormwater LID requirements due to a cost feasibility be left to the local government on a case-by-case basis? Or, should there be an attempt made to develop more defined state-wide guidance?

**General**

13. Should any type of feasibility constraints be considered for new greenfields development? Why or why not?

**Attachment: Examples of Codes and Rules that could be Revised  
to Implement & Require LID Techniques & Principles  
at Site and Subdivision Scales**

The following list contains redundancies reflecting the various ways in which local codes and rules are organized.

Land Development Standards

Clearing and Grading

Erosion and Sediment Control

Land clearing and Tree Cutting

Native Vegetation Retention

Streets and Sidewalks and Public Places

Transportation and Rights-of-Way Improvement Standards

Street and Park Trees

Zoning

Planned Unit Developments

Residential Development Standards

Single family

Multifamily

Commercial Development Standards

Commercial and Mixed Use Site Design Standards

Off-street Parking and Loading Requirements

Landscaping

Land Division or Subdivisions

Subdivision and Development Standards

General Design Standards

Street Design Standards



Minor local residential

Major local residential

Site Plan Review

Density and Dimensions

Utilities

Surface water and Drainage Code

Engineering Design Standards and Drawings

Stormwater

Transportation/Road Standards

Road Sections

Permeable Pavement Sections, Details, Plans

Parking Lot Planter Beds

Clearing, Grading, and Erosion Control

Public Works Standards and Drawings

Right-of-Way

Neighborhood Access

Parking Standards

Bioretention Swales

Bioretention Driveway Crossing

Bulb-out Parking

Curb Inlets