

City of Tacoma Comments on March 2016 Draft of Stormwater Control Program – Out of Basin

General

1. Define watershed as used in the context of this document. It appears in the context of this document that watershed is defined as the contributing basin to a single receiving waterbody and could include several outfalls and discharge locations.
2. The 1st draft of the Stormwater Transfer Program included discussion of Minimum Requirements #5 – Onsite Stormwater Management and Minimum Requirement #6 – Water Quality. The 2nd Draft appears to only apply to Minimum Requirement #7 – Flow Control. Is this meant to imply that Ecology will not approve Out of Basin Transfers for onsite stormwater management BMPs or water quality treatment BMPs? The City of Tacoma believes there are benefits to including water quality as part of this program.

Guidance Overview – Page 1

3. Define receiving water.

Key Stormwater Control Transfer Program Elements - Page 4

4. Item #6 states, “The Permittee shall provide annual reports to Ecology documenting flow control capacity used and available in offsite facilities associated with this program.” What is Ecology going to do with this information? The Permittee will have this information available, it is unclear why the information needs to be supplied to Ecology in an annual report.

Specific Technical Guidance for Flow Control Improvement Transfers – Page 4

5. Item #2 – consider adding the words “like for like” to clarify this sentence.
6. Item #6 states, “Where regional facilities in a high priority watershed will serve to provide capacity credits for purchase, it should be designed for future build-out of the area draining to it, whenever possible, so that it can fully meet the needs of the drainage area.” In urban settings it is unlikely that a regional facility can be designed for future build-out. The addition of this language may discourage the design of regional facilities. The City recommends removing this sentence.
7. Item #6 states, “When a regional facility has exhausted its capacity credits, redevelopment projects within its drainage area...” Should the statement say new and redevelopment projects?

Table 2 – Page 6

8. This table is confusing and should be removed or thoroughly clarified. Include definitions for project site and transfer site. It is recommended to describe pre-project as “pre-project (existing) land cover. If this table remains, below is recommended language.

Pre-Project (Existing) Land Cover	Post-Project Land Cover	Flow Control Requirements
Forested	New Impervious	Project Site: Provide onsite flow control BMPs to match

		predeveloped (forested) conditions. Flow Control Improvement Transfer: Not Allowed
Lawn/Landscaped	New Impervious	Project Site: Provide onsite flow control BMPs to match pre-project (lawn/landscaped) conditions. Flow Control Improvement Transfer: Transfer flow control improvements to match pre-project (lawn/landscaped) flow durations to predeveloped (forested) flow durations.

Prioritization Analysis Support

9. The first sentence states, “As a first step..., a Permittee must articulate a clear prioritization goal/focus...” It appears that Ecology has already stated (page 3) the goal of the program to be to “Reduce the duration and frequency of high stream flows...”
10. Under Step 4, provide additional guidance on what “actively seek input” means, for example, what is the obligation, who are the contacts, how long do Permittees have to wait for response. As written, this could be interpreted differently amongst jurisdictions.

Page 9

11. Should Table be relabeled to just address Minimum Requirement #7?

Page 12

12. Under Data Sources, in the notes section should the reference to runoff treatment transfers be removed?

Page 13

13. Remove reference to stormwater management treatment.
14. What does “ripeness to proceed” mean?

Background – Page 17

15. Remove water quality from the last sentence.
16. Monitoring guidance is inconsistent and may not provide data that is useful to every Stormwater Transfer Program. Remove paragraphs two through four and replace with more generic language such as: “A monitoring plan shall be developed to measure the effectiveness of the Stormwater Control Transfer Program. The Permittee shall develop a monitoring plan

appropriate for the Program and submit the monitoring plan to Ecology for review and approval.”

Determining a Project’s Stormwater Improvement Transfer Obligation – Page 18

17. The NOTE is confusing. Does the note mean that if the project were historic prairie prior to settlement that the project would also not be able to participate in the program? If this is the case, the language should be rewritten as follows: “Projects that convert a forested land cover or historic prairie to any other...”
18. After note, create a new header for the example and consider putting the whole example alone on one page.

Table 3 – Page 19

19. The example provided would not be considered redevelopment under the Phase I NPDES Municipal Stormwater Permit. The example would be considered new development because the existing lot has less than 35% existing hard surface coverage. It is recommended to include a diagram to show a scenario. See below for suggested updates to table:

Table 3: Example Project		
Pre-Project (Existing) Land Cover	Post- Developed-Project Land Cover	Flow Control Requirement(s) to be added as part of the Development Project
0.5 acres Forested	0.5 acres New Impervious	Project Site: Provide onsite flow control BMPs to match post-project (0.5 acres impervious) to pre-project (0.5 Acres Forested) Impervious to Forested conditions. Transfer Site Flow Control Improvement Transfer: No Additional Improvements (transfer not allowed)-Not Allowed.
3.3 acres Pasture	3.3 acres New Impervious	Project Site: Provide onsite flow control BMPs to match post-project (3.3 acres impervious) to pre-project (3.3 acres pasture) conditions. Acres Impervious to Forested Flow Control Improvement Transfer Site: Transfer flow

		control improvements to match pre-project (3.3 acres pasture) flow durations to predeveloped (3.3 acres forested) flow durations. 3.3 Acres Pasture to Forest
1.0 acre Lawn/Landscape	1.0 acre New Impervious	Project site: Provide onsite flow control BMPs to match post-project (1.0 acres impervious) to pre-project (1.0 acres lawn/landscape) conditions. 1.0 acre Impervious to lawn/landscape Flow Control Improvement Transfer site: Transfer flow control improvements to match pre-project (1.0 acre lawn/landscape) flow durations to predeveloped (1.0 acres forested) flow durations. 1.0 acre lawn/landscape to forested
0.2 Effective Impervious	0.2 Replaced Impervious	Project site: No Additional Improvements Not Allowed. Flow Control Improvement Transfer site: Transfer flow control improvements to match pre-project (0.2 acre impervious) flow durations to predeveloped (0.2 acres forested) flow durations. 0.2 acre Impervious to forested

Table 4 – Page 20

- 20. The number 4 should be changed to 3.
- 21. Define the “debit” concept.
- 22. It does not appear that the Notes would apply in every scenario, please clarify.
- 23. In the table, consider using the same terminology as used throughout the document text.

Allowable Regional and Equivalent Facilities – Page 22

- 24. The term retention basin is no longer used in Ecology’s SWMMWW. Consider revising to use common terminology amongst guidance documents.

Calculating Net Capacity (in terms of acreage) of Regional or Equivalent Facilities in Priority Watersheds
– Page 30

25. The term retention basin is no longer used in Ecology's SWMMWW. Consider revising to use common terminology amongst guidance documents
26. Facilities with a flow splitter can still provide hydrologic benefits to the receiving waterbody. Permittees should be allowed to justify to Ecology why a flow splitter is required and the benefit of the facility with the flow splitter.

Step A2 – Page 24

27. "do not modified" should read "do not modify".

Step A4 – Page 24

28. "do not modified" should read "do not modify".

Paragraph C – Page 22

29. Remove the sentence: "In this case, it may only be necessary to create a Table 4..." It is unnecessary and inclusion of the language may create confusion.

Reforestation – Page 26

30. It is stated, "Existing native vegetation areas that have the potential to be developed cannot be used for this reforestation credit." This appears to imply that those existing native vegetation areas that cannot be developed might be eligible for the program though this concept is not referenced in the document. If this is the case, please include language concerning existing vegetation areas that cannot be developed as potential sites for the program.