

CLARK COUNTY STAFF REPORT

DEPARTMENT: Public Works / Clean Water Division

DATE: July 12, 2016

REQUESTED ACTION: Approve attached revisions to the *Clark County Stormwater Manual 2015 – Errata July 2016* (County Stormwater Manual) to correct minor typographical and content errors. The adopted documents shall be effective upon approval of this staff report.

Consent Hearing County Manager

PUBLIC WORKS GOALS:

- Provide safe and efficient transportation systems in Clark County
- Create and maintain a vibrant system of parks, trails and green spaces
- Continue responsible stewardship of public funds
- Promote family-wage job creation and economic development to support a thriving community
- Maintain a healthy, desirable quality of life
- Increase partnerships and foster an engaged, informed community
- Cultivate a nimble, responsive work force
- Make Public Works a great place to work

BACKGROUND

Pursuant to Clark County's Phase I Municipal Stormwater Permit issued under the National Pollution Discharge Elimination System (NPDES) program, Clark County updated its stormwater manual and stormwater-related code to be equivalent to the *2012 Stormwater Management Manual for Western Washington as amended in December 2014*. The County Stormwater Manual was adopted November 24, 2015, and became effective January 8, 2016.

After adoption of the manual, a number of minor grammatical and content errors were found that require edits to the manual. Rather than simply publish an errata sheet, the Clean Water Division chose to update the manual itself to ensure changes would not be overlooked by users. The County Stormwater Manual is adopted by reference in stormwater code Clark County Chapter 40.386.

COUNCIL POLICY IMPLICATIONS

The Department of Ecology has approved the *Clark County Stormwater Manual 2015* and is modifying the National Pollutant Discharge Elimination System Phase I municipal stormwater permit (Permit) to reference Clark County Stormwater Manual 2015 as an equivalent manual to the Ecology Stormwater Management Manual for Western Washington. The proposed manual revisions make no changes from the Ecology stormwater permit and manual.

ADMINISTRATIVE POLICY IMPLICATIONS

The revised Errata July 2016 manual will replace the original 2015 manual on the county web page with a notice that the errata changes are completed. Along with the revised manual, an errata sheet will be posted.

COMMUNITY OUTREACH

An extensive, two-year-long outreach campaign with internal and external stakeholders was used to develop the stormwater manual. For this update, internal and external stakeholders were asked to

PW16-081

forward typos or errors they discovered in the new manual and provided useful input. Several internal stakeholder meetings were hosted to discuss updates. All input from stakeholders were reviewed and addressed in the manual errata work.

BUDGET IMPLICATIONS

YES	NO	
X		Action falls within existing budget capacity.
	X	Action falls within existing budget capacity but requires a change of purpose within existing appropriation.
	X	Additional budget capacity is necessary and will be requested at the next supplemental. If YES, please complete the budget impact statement. If YES, this action will be referred to the county council with a recommendation from the county manager.

BUDGET DETAILS

Local Fund Dollar Amount	n/a
Grant Fund Dollar Amount	n/a
Account	n/a
Company Name	n/a

DISTRIBUTION:

Board staff will post all staff reports to The Grid. <http://www.clark.wa.gov/thegrid/>



Dean Boening
Clean Water Division Manager



Heath Henderson, P.E.
Public Works Director/County Engineer

APPROVED: _____
CLARK COUNTY, WASHINGTON
BOARD OF COUNTY COUNCILORS

DATE: _____

SR# _____

Exhibit A – Clark County Stormwater Manual update binder:

- Errata Summary Sheet
- Updated Clark County Stormwater Manual 2016 – 1) Book 1 – Administration; 2) Book 2 – BMP Design; 3) Book 3 – Source Control; 4) Book 4 – Operations and Maintenance

PW16-081

Draft Response to Ecology Review of Clark County's Stormwater Runoff Controls

Comment No.	Document	Book	Section	Page	Ecology Comment	Final Response for 2015 Manual	Adoption Draft Reference	Adoption Draft Page	Changes needed to 11-24-2015 Adoption Draft for Appendix 10 Compliance
2	Code		40.386.0 20.B		Use of the Washington Department of Transportation Highway Runoff Manual 2014 must proscribe the feasibility criteria method used in that manual, as it is not appropriate for use outside the WSDOT. Using the Clark County SWMM feasibility criteria and methods, as approved by Ecology, is appropriate.	Changes made.			None needed
13	Manual	1	1.2.1	5	This section indicates that all publicly funded linear transportation projects are exempt from the Clark County Manual, provided that they follow the "latest Ecology- Approved edition of the WSDOT HRM." First, refer to the 2014 HRM that has been approved by Ecology. Second, the HRM will not completely replace the Clark County Manual. As in past approvals, only portions of the HRM are applicable to Municipalities. Ensure that the adoption of the HRM is only applied to the portions that are applicable to the municipality.	Revised to comply with Ecology comment.	Book 1, 1.2.1		5 None needed
14	Manual	1	1.2.2	5	"Normal Landscape Maintenance Activities and Gardening" is not clearly defined. The 2014 SWMMWW does not include an exemption for this activity. Clarify how this exception is equivalent or more protective.	Resolved with no change. Landscaping exemption is moved from Appendix 1 definitions to explicitly make it an exemption	Book 1, 1.2.2		6 None needed
23	Manual	1	2.2	68	<i>Bullet 5.</i> - Clark County is proposing to use a single event model to demonstrate flow control. Ecology requires that Flow Control meet requirements based on WWHM or an approved continuous flow hydrology model. Demonstrate that the proposed criteria is equivalent or more protective.	Table 1.1 in Book 2 states that continuous simulation hydrologic models are to be used for flow control. Single event models are allowed for infiltration sizing. MR 7 applies to flows discharging to surface waters. If full infiltration is occurring, then there's no discharge to surface waters. If full infiltration is not achieved, then an approved continuous flow control model must be used for the flows that are discharged from the site. Single event models are also used to size conveyance facilities. Note: this language has now been moved to <u>Book 2</u> .	Book 2, 1.2		7 None needed. Table 1.1. states that the event model is only allowed for sizing infiltration facilities and that the continuous flow model applies to meet MR #7.
36	Manual	1	3.5.3.2	99	The infeasibility criteria for Full Infiltration specifies a minimum rate of 1 inch/hour. The 2014 SWMMWW, Volume III, Section 3.1.1, starting on page 3-4 does not have the same restriction. Demonstrate how the proposed criteria is equivalent or more protective.	Revised to comply with Ecology comment.	Book 1, 2.5.1.3	85-86	Change is made
41	Manual	1	3.7.2	103	<i>BMP 75.30B Dispersion to Pasture or Croplands:</i> The "Applications and Limitations" listed here are not as inclusive as in Clark County's prior Ecology approved manual (starting on Page 4-25). The prior approved manual included ownership, infiltration rate, driveway, depth to groundwater and reference to the conventional Full Dispersion BMP. Include the additional criteria or demonstrate how the Clark County Program will be equivalent or more protective.	Revised to comply with Ecology comment.	Book 1, 2.5.3.2, 5th bullet. Also see Book 2, BMPT5.30B	89-90 111	

Draft Response to Ecology Review of Clark County's Stormwater Runoff Controls

Comment No.	Document	Book	Section	Page	Ecology Comment	Final Response for 2015 Manual	Adoption Draft Reference	Adoption Draft Page	Changes needed to 11-24-2015 Adoption Draft for Appendix 10 Compliance
48	Manual	1	3.9.2.2	109	The wording is unclear regarding run-on from pervious surfaces. The Clark County manual says that no run-on from pervious surfaces is allowed, but then goes on to say what to do regarding minor or incidental pervious area run-on. This wording is not found in the 2014 SWMMWW and could be a barrier to implementing LID. Demonstrate that Clark County will be equivalent or more protective.	Revised to comply with Ecology comment.	Book 1, 2.5.5.2		99 Change is made
90		2	1.2	11	<i>BMP 711.11</i> : The Clark County Manual does not refer to a specific standard for Oil treatment devices as per the SWMMWW Volume V, Page 10-17. Specify the appropriate standard that is equivalent or more protective.	Performance objective is described in Book 1, 3.4.1.3. Design criteria are prescriptive and do not need to describe the performance criteria. No change is needed.			No change needed. Language is in BMP selection section on performance objectives