

# City of Bellingham

I highly recommend you have someone do a review of the manual with one specific goal - to check logical flow (somebody that has done coding would be ideal). As a local stormwater jurisdiction reviewer I am always having consultants attempt to argue why they should be allowed to not do or to do something based on a specific paragraph / section of the manual however often that section of the manual or specific language is only in relation to a specific case or it is overridden by another section of the manual (but unless you have memorized the entire manual it is not always obvious).

For example: The requirement to add a sand filter layer in an infiltration BMP. This requirement shows up in many places in the manual and the guidance is not always clear. After much debate and discussion I have decided to require - 6" if min req 6 has not been triggered, 12" for permeable pavements if it does not accept run-on from other surfaces, and 18" for infiltration basins or trenches or permeable pavement if the surface does accept run-on. I also require the sand filtration specification is placed on the plans as "sand" has many variable meanings. I came to this conclusion based on my best understanding of what the writers of manual intended, however it is by no means cut and dry with the current language.

Another example of a consistency is around the LID modeling guidance. The guidance says that areas meeting BMP T5.13 can be modeled as pasture however in another section it says forest or pasture areas are not appropriate in the post developed condition without protections such as easements or it being in a park area etc (I am paraphrasing from memory). This creates some confusion...forest areas I think we can all agree (though I have had consultants argue to be allowed to model treed areas as forested without protections since it doesn't say you can't in the modeling guidance). The pasture areas though is not clear, what should a jurisdiction require if anything to allow them to take the modeling credit?

I will provide more comments at a later date on anything erroneous or could use further clarification but I see the logical flow as the most critical area for improvement.