

Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	Comment	Comment Made By
I-3.4.4 MR4: Preservation of Natural Drainage Systems and Outfalls	Make it clear that the supplemental guidelines only apply to MR 1-9 projects.	Rod Swanson , Clark County Public Works
I-3.4.5 MR5: On-Site Stormwater Management	Do not require meeting the performance standard for all rural projects on sites larger than 5 acres. There are projects where meeting the performance standard is not possible because LID BMPs are infeasible. A variance from a MR is a big deal because it requires a public notice. Projects should be able to use the MR 1-9 list if the LID BMPs needed to meet the performance standard are infeasible.	Rod Swanson , Clark County Public Works
I-3.4.5 MR5: On-Site Stormwater Management	Flow exempt projects should not be required to use BMPT5.10A. It is not needed. This will be used to reduce treatment facility size if feasible .	Rod Swanson , Clark County Public Works
I-3.4.7 MR7: Flow Control	Flow control exemption appears to require discharge through an MS4. That should be removed because a conveyance system may not be an MS4. Is that language there because the manual is intended to only apply to MS4s? For example a commercial site regulated by a county that does not include a discharge up hill to a road but downhill to a exempt water body.	Rod Swanson , Clark County Public Works
I-3.4.8 MR8: Wetlands Protection	Consider a higher threshold for applying MR #8 based on project size and wetland size. Doing the analysis for a short plat or small commercial project seems like overkill. Also, I hear there are problems applying the WWHM to small projects.	Rod Swanson , Clark County Public Works
I-3.6.2 Exceptions/Variations to the MRs	Put the definition of an exception here. It is one sentence in the glossary.	Rod Swanson , Clark County Public Works
I-3.3 Applicability of the Minimum Requirements	Adding the language regarding assumed hard surface for SFRs in subdivisions is an improvement.	Rod Swanson , Clark County Public Works
I-4.12 Determining Treatment Requirements	Page#175: The first sentence in the 4th paragraph contradicts with the last sentence in page#179 regarding treatment requirement for insignificant pollutant loading.	Subhash Poudyal, Clark County Public Works
I-4.13 Classification of Vadose Zone Treatment Capacity	Table# I-4.4: Table 5.4 of UIC guidance manual has some different recommendations from this manual. Which one supersedes?	Subhash Poudyal, Clark County Public Works
I-4.13 Classification of Vadose Zone Treatment Capacity	Table# I-4.2: Liked the idea of specifying hydraulic conductivity ranges. But these numbers are often highly skewed and may not accurately reflect the actual characteristics of the prevailing soil type.	Subhash Poudyal, Clark County Public Works
I-4.2 How UIC Wells are Regulated	Page #162: The last row in 5th paragraph should be revised for clarity. "If" instead of "that"?	Subhash Poudyal, Clark County Public Works
I-4.8 Prohibitions	Page #169: Third bullet- Any set-back distance for a drywell to be used up gradient of a contaminant plume?	Subhash Poudyal, Clark County Public Works
I-C.2 Levels of Wetland Protection	Level 1, Criteria 3 and Level 3, Criteria 1 conflict. Either make L3 C1 Cat. IV with a Hab score of 7 points or less OR L1 C3 Cat. III wetlands with a Hab score of 8 or more points.	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
I-C.2 Levels of Wetland Protection	For Level 3, Criteria 1, new buffer guidelines set the bar for protection of habitat functions at a Rating Form Habitat score of 5 points rather than 4 points. There needs to be consistency between the buffer guidelines and the Wetland Protection guidelines for MR# 8.	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
I-C.2 Levels of Wetland Protection	For Level 3 Protection, consider including Cat III and IV wetlands that score L on H1 on the habitat form regardless of the total Habitat score. Why should we preclude using wetlands that are not performing habitat functions very well for runoff treatment or flow control BMPs just because they are in a landscape position favorable for habitat function or proximate to a Priority Habitat Area? If the total habitat score is greater than 4 points (or 5 per prior comment) require an increase in habitat function as part of the protection criteria if used for a runoff treatment or flow control BMP.	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
I-C.2 Levels of Wetland Protection	Are there any specific considerations for flow through systems? It seems like analysis would not be needed if there is low potential for inundation of any significant duration.	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
I-C.5 Hydroperiod Protection Guidelines for Wetlands	Vegetation Richness Criteria Group: It is not clear when the criteria should be applied. Is it tied to metrics on the Wetland Rating Form or some other method and threshold for determining "relatively high vegetation species richness"	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
I-C.5 Hydroperiod Protection Guidelines for Wetlands	Amphibian Criteria: The ability to verify habitation by breeding amphibians is highly seasonal, weather, and hydrograph dependent. Documentation could require multiple egg mass surveys over 3 or 4 months in the spring. It will also be impractical for jurisdictions to verify or enforce unless they hold review until the next breeding season and have the flexibility to schedule their work based on hydrologic and weather conditions. Consider field indicator based criteria that can be verified at any time of the year.	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
I-C.5 Hydroperiod Protection Guidelines for Wetlands	Amphibian Criteria: Is Level 3 Protection really inappropriate for native amphibian species are common and that have been demonstrated to be highly opportunistic or readily adaptable to fluctuations in hydroperiod; Pacific treefrogs for example?	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
I-C.5 Hydroperiod Protection Guidelines for Wetlands	Hydroperiod Monitoring: Data collection requirements are expensive and are generally not compatible with planning, design, and permitting cycles for private development. The vast majority projects will default to the alternative criteria. Why recommend a methodology that will rarely be utilized? The methodology should be included as an option, but the guidelines should recognize that the default will be to use the presumptive criteria.	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
I-C.5 Hydroperiod Protection Guidelines for Wetlands	Contour Data: Wetlands are not usually confined to individual property ownership boundaries. Project proponents are unlikely to have access to reliable bathymetry data beyond the limits of their site boundary. Even if permission can be obtained for off-site data collection, the expense (even for LIDAR) for a large wetland assessment unit could be impractical. Practitioners will end up massaging their assumptions to present the most favorable result the model can generate and jurisdictions will have a difficult time verifying those assumptions.	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov

I-C.6 Jurisdictional Planning for Wetland Protection from Stormwater	Data Needed: Are these guidelines suggesting that wetland delineation is needed for planning level work under I-C.6? Wetland delineation is only practical at a project site scale. Even a rigorous local wetland inventory is likely to be unaffordable for jurisdictions with a large geographic extent.	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
I-C.6 Jurisdictional Planning for Wetland Protection from Stormwater	Monitoring: Is the monitoring suggested here tied to reporting requirements for Phase I Permittees?	Brent Davis, Clark County Community Development, Wetland and Habitat Review Manager, Brent.Davis@clark.wa.gov
III-1.1 Choosing Your Source Control BMPs	Pollutant sources for retail and services should include solid waste and liquid waste storage areas. These are the biggest part of our source control work. For example, trash compactors at multiplexes are a source of liquid squeezed out of trash and leaks from the hydraulic system.	Rod Swanson , Clark County Public Works
I-2 Relationship of this Manual to Regulatory Requirements	Add SEPA because the manual should be applied by the permitting agency when a determination of nonsignificance is made. The DNS basically says municipal code addresses SEPA. It would seem that state law would require the most current stormwater standards in the DNS. Consider including a discussion of how the manual relates to GMA protection of critical areas as best available science.	Rod Swanson , Clark County Public Works
Volume IV	Volume IV should have design standards for enclosed dumpster enclosures with drains to sanitary sewer. This prevents dumpster enclosures from having drains to storm sewer.	Rod Swanson , Clark County Public Works
V-4.1 BMP TS.10	Using the term loam creates confusion because there are several loam soils in the USDA texture chart. Perhaps the manual should provide textural ranges based on sieve analysis rather than verbal textural names such as loam.	Rod Swanson , Clark County Public Works
I-F Comprehensive Planning	There is no document to comment on here. Keep it as a separate guidance document without performance requirements in it. Especially since it is not part of the draft permit language.	Rod Swanson , Clark County Public Works
I-D Regional stormwater facilities	Promoting regional facilities for off-site stormwater controls makes sense for a number of reasons. It should help promote redevelopment in older commercial areas. Ecology should consider establishing a work group that includes a set of stakeholders able to further refine technical , policy and financial issues for implementing regional facilities under the guidance.	Rod Swanson , Clark County Public Works
I-D Regional stormwater facilities	Ecology should not be highly concerned about future projects using regional facilities built to current standards because it appears unlikely future standards will be stricter in the foreseeable future. And it is probable as we begin detailed catchment-scale planning, that management goals or standards may be adjusted considering the reality of beneficial use attainability.	Rod Swanson , Clark County Public Works
I-D Replaced hard surfaces timing	The ability to allow development projects to forgo BMPs if the municipality has a plan to build a regional facility to serve it within five years could be a concern if this language is not part of the minimum requirements in Appendix 1 of the permit.	Rod Swanson , Clark County Public Works