

Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	Comment	Comment Made By
BMP T5.13: Post-Construction Soil Quality and Depth	This BMP needs a standardized construction detail or details. I know there are many ways to meet this requirement which makes having a standard construction detail difficult - regardless, it still needs to be done. Plan designers and engineers are good to specify the requirement in their stormwater report and on the plans, and therefore, the project is permitted by the City. However, the contractor or landscaper who bid the plans does not understand what "BMP T5.13" entails and time and time again does not include amending the soil in their bid.... because it was not included in an understandable way. To avoid hours and hours of wasted time, I suggest a construction detail (or multiple details to chose from) that clearly showed the depths, type of amendment, call-outs with testing requirements, final OMC requirements, etc. be developed and included in the SWMMWW.	Vince McIntyre Engineer I Port Angeles (COPA) Civil City of
BMP T7.30: Bioretention	Does research support continued exclusion of compost containing biosolids for use in bioretention facilities? I performed a recent literature review of the transport and fate of emerging contaminants, personal care products, antibiotics, birth control, prescription and non-prescribed drugs, etc. all the way through compost and into produce production and every scholarly research report could be summarized in one phrase - de minimis. What justification does ECY cite for continuing to exclude using compost containing biosolids? I recommend allowing compost containing biosolids to be used in bioretention facilities.	Vince McIntyre Engineer I Port Angeles (COPA) Civil City of
BMP T7.40: Compost-Amended Vegetated Filter Strips (CAVFS)	This BMP needs serious help. When the CAVFS language in the SWMMWW is compared against the WSDOT language (where it originated from) it is clear that there are significant holes in the SWMMWW BMP. From all perspectives, the language included in this BMP is very confusing which has led to serious issues between the jurisdiction, the project engineer, the contractor, and the owner. The "presumptive approach" and "custom approach" need to be tabbed under "Ways to achieve 5% OMC". Too often applicants interpret "presumptive approach" as "if I till in 1.75" of compost then I've built a CAVFS." Additionally, including the words "other soil amendments" and "topsoil" in this section suggest that an applicant does not have to use actual compost to build a CAVFS. If this is true, like a custom product that meets all the testing requirements but does not include compost, then please clarify. If in fact compost is required to provide treatment, get rid of "topsoil" and "other soil amendment." And finally, WWHM has a CAVFS modeling section yet the SWMMWW does not discuss nor require a printout showing the water quality storm is treated. Why not? Last item - as above, I suggest allowing compost made with biosolids to be used in CAVFS as the research performed over the last decade supports it.	Vince McIntyre Engineer I Port Angeles (COPA) Civil City of