Pierce County

Dear Ecology Staff,

Please find attached Pierce County's comments on the 2019 Draft SWMMWW. The spreadsheet is a compilation of County staffs comments from the areas of maintenance, operation, surface water, design, and permitting. If you should have any questions on these comments please feel free to contact me.

Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	**Comment**	**Comment Made By**
I-3.4.5 MR5: On-Site Stormwater Management	*Table I-3.1 "Minimum Requirement # 5 Compliance Options for Projects Triggering Minimum Requiremnts #1 - #9: Projects outside the UGA, on a parcel 5 acres or larger: Use any Flow Control BMPs desired to achieve the LID Performance Standard, and apply BMP T5.13: Post-Construction Soil Quality and Depth. If the project can't meet the LID Performance Standard, it must seek and be granted an exception/variance.* This requirement appears to be overly stringent. Property outside of the UGA, especially parcels five acres or larger, should have less overall impact on water quality than intensive development within the UGA. It seems that these projects should be given the same List options as projects within the UGA or projects outside of the UGA but less than five acres. By automatically requiring the LID Performance Standard for projects greater than 5 acres outside of the UGA applicants are forced to pay engineers to perform the LID performance standard modeling even though a project can easily comply with the applicable list 1 or list 2 items. This is a very common question our reviewers get asked and we struggle to be able to answer why this is necessary. Pierce County's zoning on large parcels outside the UGA is typically for single family residences. Most of the proposals we see are creating less than 10,000 square feet of new hard surfacing. We therefore request that the prescriptive list options be allowed on parcels greater than 5 acres outside of the UGA.	Pierce County Planning and Public Works Department
BMP C151: Concrete Handling	*3. De minimum washout to formed areas* This appears to be a typo - de minimus.	Pierce County Planning and Public Works Department
BMP C154: Concrete Washout Area	*Figure II-3.7: Concrete Washout Area with Wood Planks* - Please revise detail to include feet and inches	Pierce County Planning and Public Works Department
BMP C154: Concrete Washout Area	*Figure II-3.7: Concrete Washout Area with Straw Bales* - Please revise detail to include feet and inches	Pierce County Planning and Public Works Department
S406 BMPs for Deicing and Anti-Icing Operations for Streets / Highways	***"Maintenance Operations*** *- Cover and contain nearby storm drains to keep runoff from entering the storm drainage system."* We request that this BMP be clarified to apply only to the storm drain catchbasins in the vehicle equipment yard or maintenance yard. As worded it could be interepreted to mean catchbasins on the roads being treated with deicer.	Pierce County Planning and Public Works Department
S426 BMPs for Spills of Oil and Hazardous Substances	"*Description of Pollutant Sources: Federal law requires owners or operators of facilities engaged in drilling, producing, gathering, storing, processing, transferring, distributing, refining, or consuming oil and/or oil products to have a Spill Prevention and Emergency Cleanup Plan (SPECP). The SPECP is required if the above ground storage capacity of the facility is 1,320 gallons or more of oil. Additionally, the SPECP is required if the facility, due to its location, could reasonably be expected to discharge oil in harmful quantities, as defined in 40 CFR Part 110, into or upon the navigable waters of the United States or adjoining shorelines {40 CFR 112.1 (b)}. Onshore and offshore facilities, which, due to their location, could not reasonThe ably be expected to discharge oil into or upon the navigable waters of the United States or adjoining shorelines are exempt from these regulations {40 CFR 112.1(d)(1)(i)}. State Law requires owners of businesses that produce dangerous wastes to have a SPECP. These businesses should refer to Washington State/Federal Emergency Spill Cleanup Requirements.* " This lead-in paragraph to S426 is confusing and seems to be out of place. We recommend that this paragraph be simplified and not provide references to a confusing array of Federal codes. The proposed Appendix IV-A addresses or should address all the different uses and pollutant generating sources that need to be addressed. The detailed content of this paragraph can be an addition to this Appendix, or a reference in the Appendix.	Pierce County Planning and Public Works Department
Appendix IV-B: Management of Street Wastes	*Table IV- B.4: Recommended Parameters and Suggested Values for Determining Reuse and Disposal Options- Lists TPH(Diesel) 200mg/kg.* Is this a typo? Diesel is listed in MTCA as Level A value of 2,000 mg/kg	Pierce County Planning and Public Works Department
V-5.6 Site Suitability Criteria (SSC)	On page 586: *"Depth of soil used for infiltration Runoff Treatment must be a minimum of 18 inches. Depth of soil used for infiltration Runoff Treatment below BMP T5.15: Permeable Pavements that is pollution-generating hard surfaces may be reduced to one foot if the permeable pavement does not accept run-on from other surfaces.* On Page 865: *"**Permeable Pavement as Runoff Treament** Ecology recogniaes the permeable pavement BMP as a basic treatment BMP (as further desccribed in III-1.2 Choosing Your Runoff Treatment BMPs) if it meets either of the follwing criteira: * The permeable pavement design includes a 6" layer of sand that meets the size gradation (by weight) given in Table V-6.1: Sand Medium Specification. "* These two paragraphs conflict or at least cause some confusion. We recommend that the paragraph on page 586 be revised to include the 6 inch layer of sand option spelled out on page 865.	Pierce County Planning and Public Works Department
BMP T5.15: Permeable Pavements	*Figure V-5.1: Example of a Permeable Pavement (Concrete or Asphalt) Section - 1" washed sand or 0.5" washed crushed stone for base material below permeable surface* We have a concern with this detail showing 1 inch of washed sand being placed between the open graded base material and the permeable pavement mix. Placement of sand over open graded base material does not work from a structural support perspective. The sand will quickly filter into the underlying open graded material. While we understand this is a schematic detail that is not for actual construction, it is misleading. We therefore request that the 1" washed sand option be removed from this detail.	Pierce County Planning and Public Works Department

BMP T5.15: Permeable Pavements	Page 864 ***"Infeasibility Criteria*** *- Where land for bioretention is within an area designated by the local government as an erosion hazard."* "Bioretention" in this sentence should be replace with "permeable pavement" as this infeasibility criteria section is about permeable pavement.	Pierce County Planning and Public Works Department
BMP T5.15: Permeable Pavements	*Figure V-5.3: Example of a Check Dam Along A Sloped Section of Permeable Pavement - Longitudinal slope typ. maximum 5%* - This is confusing is 5% refering to when check dams are needed? We recommend changing to:" Longitudinal slope typ. maximum 5% for porous asphalt, 10% for pervious concrete and 12% for pavers".	Pierce County Planning and Public Works Department
Appendix V-A: BMP Maintenance Tables	We recommend that the table format be consistent for each element/checklist. The maintenance frequency should be provided for each element.	Pierce County Planning and Public Works Department
Appendix V-A: BMP Maintenance Tables	*Table V-A.1: Maintenance Standards - Detention Ponds General- Tree Growth and Hazard Trees* - "Tree growth does not allow maintenance access" Please reword to "Tree growth does not allow maintenance and inspection access" in all cases.	Pierce County Planning and Public Works Department
Appendix V-A: BMP Maintenance Tables	*Table V-A.5: Maintenance Standards - Catch Basins Catch Basin Cover - Cover Not in Place - Results Expected When Maintenance is performed - "Catch basin cover is closed"* Recommend replacing with "Cover/grate is in place, meets design standards and is secured"	Pierce County Planning and Public Works Department
Appendix V-A: BMP Maintenance Tables	*Table V-A.5: Maintenance Standards - Catch Basins Metal Grates (If Applicable) Damaged or Missing. - Results Expected When Maintenance is performed - "Grate is in place and meets design standard."* Recommend replacing with " "Grate is in place, meets the design standard, and is installed aligned with the flow path."	Pierce County Planning and Public Works Department
Appendix V-A: BMP Maintenance Tables	*Table V-A.12: Maintenance Standards - Wetvaults General - Access Cover Damaged/Not Working - Cover cannot be opened or removed, especially by one person. - Pipe repaired or replaced to proper workings specifications.* Refers to pipe repair, not access cover?	Pierce County Planning and Public Works Department
I-3.4.5 MR5: On-Site Stormwater Management	There are some sites where LID BMPs are not feasible and the only option is the use of a detention system. It has been our experience that there is no way to design a detention pond that will meet the LID Performance Criteria without implementation of some LID BMP. This would mean that an applicant would have to go through a variance/exception process to obtain approval of their project. Was this Ecology's intent? That a variance would be necessary for this situation?	Pierce County Planning and Public Works Department
BMP T5.15: Permeable Pavements	*Figure V-5.2: Example of a Permeable Paver Section - 1" washed sand or 0.5" washed crushed stone for base material below permeable surface* We have a concern with this detail showing 1 inch of washed sand being placed between the open graded base material and the permeable pavers. Placement of sand over open graded base material does not work from a structural support perspective for pavers unless the sand is seperated from the open-graded base material by a geotextile fabric. The sand will quickly filter into the underlying open graded material. While we understand this is a schematic detail that is not for actual construction, it is misleading. Unlike permeable asphalt or concrete geotextile fabric is reasonable in this situation because pavers can be removed/reused if the fabric fails. We therefore request that a call out be provided that specifies a geotextile fabric requirement between the washed sand and open-graded base material.	Pierce County Planning and Public Works Department