

Response to comments

SAM Studies Proposal FP7

Stormwater BMPs Maintenance Conditions Evaluation

City of Bellevue and Aspect Consulting

1 September 2020

Comment: Did Ecology ask for the Maintenance Tables in the SWMMWW be revised/rewritten? Are there any indications that they are in need of this type of review?

Response: The proposal does not call for the SWMMWW Maintenance Tables to be revised or rewritten; rather, the proposal addresses three questions from the Priority Topic List in the RFP regarding maintenance thresholds for four types of BMPs. While Ecology did not request this review specifically, the Priority Topic questions were developed by input from municipal permittees, Ecology, and other regional stormwater stakeholders. One potential outcome of this project is to adjust some of the maintenance conditions criteria for selected BMPs in the SWMMWW Maintenance Tables.

The need for this review is based on permittee experience and discussions among permittees and with Ecology about implementation of O&M practices following permit requirements. An example is provided in the proposal of evaluating the frequency and cost of cleaning sediment from vaults. The experience of Bellevue and some other permittees indicates that implementation of vault O&M, especially sediment cleaning, could be done significantly less frequently in many settings than the SWMMWW recommends while still protecting water quality. This could translate to significant cost-savings to permittees and better information about the frequency of vault cleaning.

Comment: Will this project get the voluntary participation it's asking for? Will it get the participation from a diverse group of permittees or just those that typically respond to these types of requests? How is the study planning to ensure that final recommendations don't lead to degraded water quality?"

Response: The participation by permittees for this project will be through TAC participation, survey responses, and participation by a few jurisdictions in the pilot O&M data evaluation. In addition, Ecology will participate through interviews about some of the BMP maintenance standards in the SWMMWW. The project team has received supportive responses from a few permittees about participation on the TAC (Kirkland, Sammamish, and New Castle so far), and representatives from Ecology on the SAM Studies subgroup have indicated willingness to help find appropriate Ecology staff to be interviewed.

Regarding maintaining good water quality and this study's recommendations, the white paper will present recommendations that could be implemented on an experimental basis, such as a follow-up field study under controlled conditions. Because of the variability in the types and settings of BMPs in use by permittees, any recommendations for permittees to consider would be for experimental purposes where confirmatory data is suggested to be collected to measure the impact, if any, to water quality from adjusted maintenance activities.

Comment: How do we evaluate projects like this when we assume the data needed to complete the project does not exist?

Response: Based on the background research done for this proposal, we expect that some useful analysis can be made from data that are available. Multiple data sources will be explored to mine useful data related to BMPs being reviewed. Useful data is expected to be available from published sources (International BMP Database and the Ecology TAP-E program) as well as data provided voluntarily by a few permittees for the pilot evaluation of permittee O&M data. Our preliminary research indicates that basic data to meet O&M permit requirements should be available from permittees with established O&M programs and that data can be used to provide useful answers to the questions being asked in this study. Municipal O&M data is likely to include inspection observations, frequencies of maintenance, drainage area, and for TAP-E studies, water quality data. In addition, the survey early in the project will help inform what data are available from permittees' O&M programs.

Comment: Will need to know if S8.B.3 will be needed.

Response: A data request to all permittees will not be made per permit section S8.B.3. The pilot data evaluation will request data from a few permittees who voluntarily agree, which can be counted by those permittees as one of the three data requests allowed during this permit term.