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PHASE I MUNICIPAL STORMWATER PERMIT

Structural Stormwater Controls

Preliminary Draft “Fact Sheet”

The Washington Department of Ecology (Ecology) is working on reissuing the Phase I, Western and Eastern Washington Phase II Municipal Stormwater Permits. Ecology has prepared preliminary draft sections of Permit language and is accepting informal comments on these sections until **11:59 p.m. on March 23, 2023. Submit your comments through our online comment form: <https://wq.ecology.commentinput.com/?id=u7Yd3>.**

Or mail hard copies to:

Municipal Stormwater Comments
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

Introduction

The Phase I Municipal Stormwater Permit contains requirements for Permittees to develop and implement stormwater management programs (SWMP) that take a comprehensive approach to address runoff from urban environments. The Phase I Permit includes a program requirement for Structural Stormwater Controls (SSC), which requires Permittees to prevent or reduce impacts to waters of the state caused by discharges from the MS4s. The SSC program is intended to address hydrologic and pollutant impacts not adequately controlled by other required actions of the permit, from existing development, roadways, and new development.

Legacy development, roads, and other pollutant sources continue to degrade waters of the state beyond what can be improve based on the new and redevelopment standards required in the permits. Providing treatment for existing development and pollution prevention through structural retrofits, capital maintenance, restoration, and land acquisition is needed to deal with legacy stormwater pollution. Runoff that travels from paved surfaces unmanaged into the water is currently considered to be the main source of tire wear debris and 6PPD-quinone (6PPD-q), the chemical culprit found to be causing Coho salmon deaths in small streams. 6PPD is currently used in all tires and transforms into 6PPD-q when it reacts with ozone in the environment. We already knew that road runoff was a major contributor to stormwater pollutants such as heavy metals, hydrocarbons, and sediment. The recent research on 6PPD-q and tire wear particles lends new urgency to treating runoff from roads and transportation corridors.

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Proposal Background

The Phase I SSC Program (Permit section S5.C.7) is on its fourth iteration in the 2019 permit, which requires Permittees to design and construct eligible SSC projects based on a locally developed program that includes a process to prioritize and implement projects. The SSC Program includes a list of 11 eligible project types which can receive SSC Program Points, including structural best management practices (BMPs) for flow control and runoff treatment, sweeping, line cleaning, land acquisition, and restoration projects. The current point total required in the 2019 Permit is 300 SSC Points; 225 required for planning and design and 75 points for complete or maintenance-stage projects.

In 2018, Permittees and stakeholders requested a stakeholder group to address technical and policy issues related to SSC requirements. We took a stepwise approach to the stakeholder process to inform the SSC program requirement for the 2024-2029 permit. We began by conducting a review of available scientific information about the relative environmental benefits of SSC project types. This resulted in the [SSC Science Synthesis Report](#)¹, which then informed the next phase of the stakeholder process, which was convening a Policy Advisory Committee to develop recommendations for the 2024 Permits.

The SSC Policy Advisory Committee (SSC PAC) met from May-December 2022 and used the SSC Science Synthesis as a basis to discuss quantifying SSC requirements and the level of effort by permittees implementing SSC programs. This PAC, made up of Phase I and Phase II Permittees as well as environmental non-profit representatives, discussed topics including project types, point system, metrics, refinements to Phase I SSC program, and recommendations for a Phase II retrofit approach. The [final report](#)² includes opinions that came out of a survey on Phase I and II topics and recommendations from four subgroups: Phase II, Simplified Metrics, Multipliers, and Collaboration. Due to the composition of the PAC group, there were multiple perspectives offered. There was a strong message to keep the basic SSC point system and project types for Phase I. More feedback from the SSC PAC is shared in the Proposal Summary below.

The feedback provided gave Ecology insight into the challenges that Phase I Permittees have in implementing the SSC program and highlighted the desire to meet the stormwater challenges Western Washington faces.

In developing the following proposal for the Phase I SSC program, Ecology considered early input on permit reissuance including comment letters, ad-hoc groups, the SSC TAC scientific synthesis, and SSC PAC. Ecology has developed this preliminary draft proposal to build on the retrofit work that has been done, feedback from Permittees, and the need to address road runoff and other persistent stormwater challenges.

¹ https://www.wastormwatercenter.org/wp-content/uploads/White-Paper_Structural-Stormwater-Controls-Science-Review-Synthesis-Project.pdf

² https://www.ezview.wa.gov/Portals/_1962/Documents/StructuralStormwaterControls/SSCPAC_FinalReport12.19.22.docx

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Permittees are required to submit their Annual Reports at the end of March and Ecology will be able to use those submittals to better inform this proposal for the formal draft. We believe it is important to propose changes to the Phase I SSC program sooner in the process to learn from feedback. This will contribute to more informed requirements for the formal draft, anticipated to be released in late summer 2023.

Ecology is providing a preliminary draft of the Phase I Municipal Stormwater Permit's Structural Stormwater Control (SSC) permit section as well as a draft of a revised Appendix 12, Structural Stormwater Controls Project Reporting for informal comment. We are also requesting informal comments on a new Western WA Phase II retrofit program, Stormwater Control for Priority Developed Areas.

Proposal Summary

The proposed Phase I approach for the 2024 Permit cycle is to reduce obstacles to getting structural stormwater retrofit projects built, to collaborating with other Permittees, and to reporting on a broader variety of projects. The proposed Phase I approach includes a higher multiplier on many types of structural stormwater controls, with a minimum level of effort on the "traditional" SSC project types, flow control, runoff treatment, Low Impact Development (LID) BMPs, or maintenance with capital construction costs \geq \$25,000 (Project Types 1-4 and 6). The growing knowledge of road runoff toxicity adds to the urgency to make progress on retrofits, especially in high priority pollution generating areas. The general approach and components included in the current SSC program are retained in this draft proposal, which concurs with much of the feedback we have received.

Performance Measures

Permittees were required to achieve 300 SSC Program Points by December 31, 2022 in the 2019 Permit cycle. Interim reporting shows that most Permittees will exceed this point requirement, some by a large margin. Some Permittees had multiple Project Type 1-4 retrofit projects that had unknown or unreported points not yet included in their SSC Annual Report.

We are proposing to increase the SSC Program Point total in the 2024 Permit from 300 to 500 SSC points.

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The draft Permit language also includes a slightly different allocation of required SSC Program Points between design-stage projects and those that are complete or at a maintenance stage. Since the SSC Program has been initiated since 2007 and has had a defined level of effort since 2019, the level of effort over time has shifted from planning to mostly design and is now shifting to require more construction. This is based on the idea that projects have been planned and are ready for construction. The proposed shift in allocation of SSC points is detailed in Table 1 below.

Table 1: SSC Point Requirement Changes

Previous SSC Point Requirements	New SSC Point Requirements
225 design-stage points	300 design-stage points
75 complete or maintenance-stage points	200 complete or maintenance-stage points
300 total points	500 total points

We would like to hear about the feasibility as well as potential benefits or drawbacks of these performance measures.

Incentivizing Structural Retrofit Projects

To address the large retrofit needs in western Washington and the growing concern about transportation impacts to water quality, we are incentivizing flow control, runoff treatment, Low Impact Development (LID) and significant maintenance projects (Project Types #1-4 and #6) to improve water quality benefits. To incentivize those project types, we are proposing to double the multipliers in Table 3: SSC Program Point Multipliers for projects that achieve flow control, runoff treatment (including those in known problem areas), meet Water Quality Standards for a target pollutant, or provide LID performance.

This allows Permittees to receive more SSC points for Project Types #1-4 and #6. Along with this doubling of multipliers, we are proposing a minimum number of SSC Program Points for these Project Types: 150 points.

We propose adding a definition for high pollutant generating areas (HPGA) – areas that drain to Superfund designated receiving water, areas with arterials (or AADT > 25,000), or areas with >50% commercial/industrial or high density developed land use. These will be added as a type of “known water quality problem area” that receives an additional Program Point Multiplier to encourage projects in areas that are high priority for reducing pollutants, especially those related to road runoff.

We are interested in hearing feedback on the HPGA definition and the minimum number of SSC Program Points for Project Types #1-4 and 6.

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Sweeping

The first round of preliminary drafts proposed some new street sweeping requirements, which include sweeping 3 times per year, and at least once before October 1. If the proposed sweeping requirements are added to the 2024 Permit, only additional sweeping beyond this permit-required sweeping would qualify for SSC Points.

The Point Multiplier for sweeping is proposed to decrease from 0.25 to 0.1. This is to bring sweeping points more proportional with other project types.

SSC points can be calculated on an acreage or curb mile basis. Feedback from the SSC PAC requested that acreage be used as a reporting unit and since one curb mile equals one acre (at 8.25-foot sweeping width), we are proposing Permittees can report in either acres or curb miles and that the unit be specified. If your sweeper width is different than 8.25-feet, please specify width.

Encouraging Small Projects and LID

Feedback from the PAC and other early input informed Ecology that small projects are often not reported because of the calculation of equivalent area needed for SSC points. In order to have more projects reported, we are proposing to simplify the reporting for small projects under one acre.

Projects under one acre will not need to calculate the equivalent area. Instead the total area draining to the project will be considered the full basin and this basin will be multiplied by the appropriate Program Point Multiplier. If the project has more than one benefit (LID, runoff treatment, flow control), each of these multipliers can be used and the total Program Points for all benefits can be totaled.

As noted above, the Program Point Multiplier for LID is also doubled and this benefits small projects that are often also LID projects.

Watershed Collaboration

We know that reaching water quality goals from stormwater management sometimes requires looking at watershed scale solutions. Towards that end, watershed planning was included in the 2013 permit and Stormwater Management Action Plans are being developed by Phase I counties and Phase II Permittees this Permit cycle.

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Recognizing that there are still barriers to working across jurisdictions to plan and implement projects, we are proposing to add a project type and provide some incentives through SSC points for watershed collaboration between Permittees. Watershed Collaboration projects are any project type (Project Type #1-11) where either the project area and/or drainage basin is shared across municipal boundaries, and it is planned and implemented by more than one Permittee. These are projects where Permittees can gain SSC Project Points for planning and funding an eligible project type within a watershed that their MS4 contributes. Specific stages of project implementation must be completed: interlocal agreement, funding, and implementation.

Points will be allocated to each participating Permittee based on these specific stages:

- 25 points – for interlocal agreement for all Permittees
- 50 points – for committed funding for all Permittees

Upon construction or implementation, points will be awarded to each participating Permittee based on the type of project. The area used to calculate points is either:

- 1.) the percentage of the area treated in the Permittee's jurisdiction or
- 2.) a specific percentage identified in the interlocal agreement.

The additional watershed plan multiplier can be applied to the appropriate area for each Permittee. The appropriate area is either 1.) or 2.) above.

We would like to hear comments on this proposed new project type and point allocation.

Overburdened Communities

In recognition that stormwater management programs need to be completed in locations that improve equity and environmental justice, we are proposing to double the SSC Point Factor Multiplier for completed capital projects which are in overburdened communities.

Tribal Communities

We request comments on how to incorporate benefits to Tribal Waters and resources.

Attachment A: Proposed Phase I Permit Language: S5.C.7

7. Structural Stormwater Controls

Each Permittee shall implement a Structural Stormwater Control Program to prevent or reduce impacts to waters of the State caused by discharges from the MS4. Impacts that shall be addressed include disturbances to watershed hydrology and stormwater pollutant discharges.

The program shall consider impacts caused by stormwater discharges from areas of existing development; including runoff from highways, streets and roads owned or operated by the Permittee; and areas of new development, where impacts are anticipated as development occurs.

Minimum performance measures:

- a. The program shall address impacts that are not adequately controlled by the other required actions of the SWMP.
 - i. The program shall consider the following projects:

- (a) New flow control facilities.

- (b) New treatment (or treatment and flow control) facilities.

- (c) New LID BMPs.

- (d) Retrofit of existing treatment and/or flow control facilities.

- (e) Property acquisition for water quality and/or flow control benefits (not associated with future facilities).

- (f) Maintenance with capital construction costs \geq \$25,000.

ii. Permittees should consider other projects to address impacts, such as:

- (a) Restoration of riparian buffers.

- (b) Restoration of forest cover.

- (c) Floodplain reconnection projects on water bodies that are not flow control exempt per Appendix 1.

- (d) Permanent removal of impervious surfaces.

- (e) Sweeping and line cleaning.

- (f) Watershed collaboration.

- ~~(e) Other actions to address stormwater runoff into or from the MS4 not otherwise required in S5.C.~~

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- iii. Permittees may not use in-stream culvert replacement or channel restoration projects for compliance with this requirement.
- iv. The Structural Stormwater Control Program may also include a program designed to implement small-scale projects that are not planned in advance.
 - b. Each Permittee's SWMP Plan shall describe the Structural Stormwater Control Program, including the following:
 - i. The Structural Stormwater Control Program goals.
 - ii. The planning process used to develop the Structural Stormwater Control Program, including:
 - (a) The geographic scale of the planning process.
 - (b) Issues and regulations addressed.
 - (c) Steps in the planning process.
 - (d) Types of characterization information considered.
 - (e) Amount budgeted for implementation.
 - (f) The public involvement process.
 - (g) A description of the prioritization process, procedures and criteria used to select the Structural Stormwater Control projects.
 - c. With each Annual Report, each Permittee shall provide a list of planned, individual projects scheduled for implementation during this Permit term for the purpose of meeting S5.C.7.d. This list shall include at a minimum the information and formatting specified in Appendix 12.
 - d. No later than December 31, ~~2027~~2022, each Permittee shall achieve ~~500~~300 SSC Program Points, calculated per Appendix 12, as follows:
 - i. ~~300~~225 design-stage ~~SSC Program Points~~~~retrofit incentive points~~, and
 - ii. ~~200~~75 complete or maintenance stage ~~SSC Program Points~~~~incentive points~~.
 - iii. A minimum 150 SSC Program Points for Project Types listed above at S5.C.7.a.i.(a)-(d), and (f).
 - A minimum of ~~200 SSC Program Points~~75 ~~incentive points~~ is required for complete or maintenance stage projects, additional SSC Program Points~~incentive points~~ for complete or maintenance stage projects may substitute for design-stage SSC Program Points~~incentive points~~.

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Attachment B: Proposed Phase I Permit Appendix 12 Language
APPENDIX 12 – Structural Stormwater Controls Program Project List

Instructions for Appendix 12 Reporting

Each year, Phase I City and County Permittees must submit an updated list of structural stormwater control (SSC) projects to Ecology with their Annual Reports. Table 1 provides thea format for this reporting. The submittal shall be in .xlsx (Excel) file. This section provides additional information and instructions for completing Table 1, as required, per Permit section S5.C.7.c.

Even though the defined level of effort is due to be tallied at the end of 2027~~2022~~, annual reporting of SSC Program projects provides the opportunity to track and report progress. Fill in all values as completely as possible each year. In subsequent years, Permittees should update the values for each project and add projects to new rows, as needed. You may remove projects that are cancelled or otherwise will not be used toward achieving the defined level of effort (as expressed in SSC Program Points). Projects that were completed prior December 31, 2022 ~~to July 1, 2019~~, may not be included.

Enter Design and Construction of Project Types 1, 2, 3, 4, or 6 (Table 2) on separate lines. Only show the Design Status until the project is completed. Then add the new line for the Construction status.

Table 2: SSC Project List Reporting Template

<u>Reporting Year</u>	Project Name	Project Type	Status	Cost Est.	Basin Area (ac)	LID Equiv. Area	LID Point Factor	RT Equiv. Area	RT Point Factor	FC Equiv. Area	FC Point Factor	Other Project Area- Ac or mi	Other Point Factor	Total SSC Program Points	Lat / Long (X,Y)	Receiving waterbody name	Comments
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Project List & Project Name

Permittees shall assign each SSC project its own row. Project names may change over time. If a project name changes, include a note or parenthetical that ties the new name to the old name. Maintenance actions with a recurring event frequency over multiple years must be named uniquely for each year (e.g., Sweeping for WQ 2025~~2020~~).

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Type

Ecology assigned each project type a number as described in Table 2 and this document. The project type numbers reflect the order in which they are listed in S5.C.7.a.

Status

The defined level of effort can be reflected in SSC Program Points calculated for either of two project stages: Design and Completion/Maintenance. Projects at or beyond the 60% design stage by December 31, ~~2027~~2022, shall be counted toward the defined level of effort allowed for design-stage projects. The Complete/Maintenance stage is for on-line facility construction projects, fully executed property purchases, implemented maintenance actions (that are associated with Project Types #6 and #11), and completed restoration projects. A restoration project is not considered completed until any maintenance warranty times established with the construction contract have been completed, or vegetation establishment can be verified. For tracking purposes, update the status of projects for each yearly submittal.

Cost Estimate

Estimate total costs during the Design stage and provide actual costs for the Complete/Maintenance stage. Update costs over the course of the project where known.

Where known, include local/state/federal funding sources by percentage in the 'Comments' field. Once a project is complete, the comments should reflect the accurate funding source distribution. For projects still underway, you may want to include an explanatory note to distinguish between funding sources that are secured and funding sources that you estimate.

Basin Area

Enter the total area served by the structural stormwater control project (e.g., the full basin area). For stormwater facilities, this is the catchment area contributing runoff to the facility, including upstream facilities working as a system.

If the project serves an area under one acre, enter the total area for the basin. There are more detailed instructions in the "How to Calculate Area and SSC Points for Small Projects Under One Acre".

If the project is implementing a watershed collaboration, then each participating Permittee would enter the basin area served by the project in their jurisdiction OR the basin area agreed to by the interlocal agreement. There are more detailed instructions in the "How to Calculate Area and SSC Points for Watershed Planning.

~~For other project types, this is the area purchased or otherwise conserved or restored. For line cleaning projects, this is the line miles cleaned. For street sweeping projects, enter the formula variables for curb miles swept x (# events/year - 1) event. [e.g., 20 miles x (12 - 1 sweeping events)]~~

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LID Equivalent Area and SSC Program Points

For each structural stormwater control project that you expect to result in a hydrologic benefit for small storms, use the LID Performance Standard Equivalent Area process described in the section titled 'How to Calculate Equivalent Area'. Enter the calculated LID Equivalent Area in the relevant column, then use Table 3 to identify the appropriate LID SSC Program Points.

~~If the project also provides benefits for standard flow control and/or runoff treatment, calculate equivalent areas and SSC Program Points for each benefit. There can be different SSC Program Points for each of the three equivalent areas. The SSC Program Points for LID, runoff treatment and flow control can be summed.~~

Runoff Treatment (RT) Equivalent Area and SSC Program Points

For each structural stormwater control project that you expect to result in a runoff treatment benefit (e.g., TSS, dissolved Copper, dissolved Zinc, or Total Phosphorus), calculate Runoff Treatment Equivalent Area as described in the section titled, "How to Calculate Equivalent Area." Enter the calculated RT Equivalent Area in the relevant column then use Table 3 to identify the appropriate RT SSC Program Points.

~~If the project also provides benefits for LID and/or standard flow control, calculate equivalent areas and SSC Program Points for each benefit. There can be different SSC Program Points for each of the three equivalent areas. The SSC Program Points for LID, runoff treatment and flow control can be summed.~~

Flow Control (FC) Equivalent Area and SSC Program Points

For each structural stormwater control project that you expect to result in a hydrologic benefit for larger storms, use the Flow Control Equivalent Area process described in the section titled 'How to Calculate Equivalent Area'. Enter the calculated FC Equivalent Area then use Table 3 to identify the appropriate FC SSC Program Points.

Other Project Area

For other project types, that are not Project Type 1,2,3, or 4, enter the area for the relevant project type:

~~If the project also provides benefits for LID and/or runoff treatment, calculate equivalent areas and SSC Program Points for each benefit. There can be different SSC Program Points for each of the three equivalent areas. The SSC Program Points for LID, runoff treatment and flow control can be summed.~~

Other Program Points

~~For each structural stormwater control project that is not Project Type 1, 2, 3, or 4, use Table 3 to identify the appropriate SSC Program Points and populate the "Other Project Area -Ac or mi" and "Other Program Point" column with the appropriate values.~~

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- The area purchased or otherwise conserved or restored.
- For line cleaning projects, this is the linear ~~miles~~ feet cleaned³.
- For street sweeping projects, enter the amount for curb miles or acres swept.

Specify the units used for any area. For street sweeping, one curb mile for an 8.25 wide sweep from the curb would cover an area equal to one acre. If you use curb miles as the unit, but your sweeper width is different than this, specify the sweeper width.

Other Point Factor

If your project implements an Ecology-approved basin plan (refer to Appendix 1, Section 7) or Watershed-Scale Stormwater Plan from the previous *Phase I Municipal Stormwater Permit cycles*, Special Condition S5.C.5.c, Stormwater Management Action Plan, a TMDL (refer to Appendix 2), or an Ecology-approved adaptive Management Plan (refer to S4F and Appendix 13), note the appropriate point factor here. A point factor can be applied if the project is implementing a local interlocal agreement for a watershed collaboration. See “How to Calculate Area and Points for Watershed Collaboration.”

This reporting section should also be used to identify if a project is in an overburdened community. Note the point factor here.

Total SSC Program Points

Refer to Table 3 and associated project details to determine the SSC Program Points for each SSC project. Insert the calculated value in the SSC Program Points column.

If the project provides ~~For Project Types 1, 2, 3 and 4 that provide~~ benefits for standard flow control and/or LID, runoff treatment, and/or LID flow control, calculate equivalent areas ~~SSC Program Points for each benefit based on the appropriate Equivalent Areas~~ and SSC Program Points for each benefit. There can be different SSC Program Points for each. ~~Then add the results of the three (potentially different) equivalent areas. The calculations together to obtain the total~~ **SSC Program Points for LID, runoff treatment, and flow control can be totaled.** For example, a bioretention facility would get Structural Stormwater Control points for LID, based on the LID performance standard, Runoff Treatment points for the amount that infiltrates through the bioretention soil media, and Flow Control points based on the amount that does not overflow.

Latitude/Longitude and Receiving Water Body Name

If your project has multiple locations, include a Lat/Long for each location and describe the reason why in an explanatory note. Report Lat/Long in decimal degrees to six decimal places, and include the Geographic Coordinate System (e.g., WGS84). Maintenance actions that cover a

³ Correction made to use linear feet, to align with existing language and Table 3.

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geographic area shall provide zip codes for the area addressed and attach a map at the time the SSC Program Points are calculated.

Receiving Waterbody Name

List the waterbody to which the stormwater from the project discharges. If a receiving water body is unnamed, also include the name of the water body that the unnamed creek/lake is a tributary. Also indicate if the stormwater from the project is infiltrated wholly or partially to groundwater.

Comments

If your project implements an Ecology-approved basin plan (refer to Appendix 1, Section 7) or Watershed-Scale Stormwater Plan from the previous 2013-2018 Phase I Municipal Stormwater Permit cycles, Special Condition S5.C.5.c, Stormwater Management Action Plan, ~~or~~ a TMDL (refer to Appendix 2) ~~or~~ an Ecology-approved adaptive Management Plan (refer to S4F and Appendix 13), or an interlocal watershed collaboration, note the specific plan in this field.

~~If your~~ This section should also be used to identify if a project is located in is in an overburdened community, note the community here.

This section can also be used to note any other information you feel is relevant, that is not addressed in other columns.

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Project Types

Below is a listing followed by a description of the project types that can receive SSC points.

List of Qualifying Project Types~~The allowance of a program designed to implement small-scale projects that are not planned in advance (S5.C.7.a.iv) is not considered a project type in itself. Instead, those projects are expected to be reflected in the other project type categories as applicable.~~

1. New flow control facility
2. New runoff treatment facility (or treatment and flow control facility)
3. New LID BMPs
4. Retrofit of existing treatment and/or flow control facility
5. Property acquisition
6. Maintenance with capital construction costs \geq \$25,000
7. Restoration of riparian buffer
8. Restoration of forest cover
9. Floodplain reconnection projects
10. Removal of impervious surfaces

11. Other actions to address stormwater runoff not or from the MS4 not otherwise required in S5.C~~Sweeping and line cleaning~~

12. Watershed collaboration

(1) New Flow Control Facilities

(S5.C.7.a.i.(a))—Flow control facilities need not be regional. These facilities do not have to meet the “standard flow control requirement” (refer to Appendix 1, Section 4.7) but they shall be new facilities designed to control stormwater flow from existing development. Project proponents that don’t follow design criteria from the SWMMWW, or equivalent manual, should be prepared to provide additional project details at Ecology’s request to support calculations for equivalent area, water quality benefits, and SSC Program Points. Qualifying projects in this category will be compared against the Flow Control Standard (Minimum Requirement #7) for SSC Program Point calculations.

(2) New Runoff Treatment Facilities

(S5.C.7.a.i.(b))—Runoff treatment facilities include facilities that provide oil control, phosphorus treatment, enhanced (dissolved metals) treatment, and basic treatment. Facilities in this category do not have to meet runoff treatment requirements (e.g.e.g. treat 91% of the average annual runoff) but they shall be new facilities that provide a treatment benefit for existing development. Project proponents that don’t follow design criteria from the SWMMWW, or equivalent manual, should be prepared to provide additional project details at Ecology’s request to support calculations for equivalent area, water quality benefits, and SSC Program

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Points. Maintenance activities are not classified under this project type. Qualifying projects in this category will be compared against the Runoff Treatment Standard [\(Minimum Requirement #6\)](#) for SSC Program Point calculations.

(3) New LID BMPs

(S5.C.7.a.i.(c))—These facilities are consistent with the lists of On-Site Stormwater Management BMPs of Minimum Requirement 5 and reduce the volume of runoff by infiltrating runoff from the small, more frequent storms. Qualifying new LID BMP projects result in the reduction or prevention of hydrologic changes through use of on-site (e.g., infiltration, dispersion, evapotranspiration, rainwater harvesting) stormwater management BMPs. LID principles reflected in site design techniques do not qualify because projects that apply LID principles in a retrofit setting should be accommodated in other qualifying project types (such as property acquisition and restoration of forest cover). Qualifying projects in this category will be compared against the LID Performance Standard [\(Minimum Requirement #5\)](#) for SSC Program Point calculations.

(4) Retrofitting of Existing Treatment and/or Flow Control Facilities

(S5.C.7.a.i.(d))—Retrofitting is expected to occur on previously constructed stormwater facilities that, if modified, would provide additional hydrologic or runoff treatment benefits. For example, Ecology considers the retrofit of a stormwater pond to provide a settling area and more storage, a retrofit to a stormwater facility. Maintenance activities such as removing sediment to re-establish wet pool volume but not increasing volume beyond the initial design are not classified under this project type.

(5) Property Acquisition for Water Quality and/or Flow Control Benefits

(S5.C.7.a.i.(e))— This category excludes the purchase of property for the siting of a stormwater facility. Instead, purchase of a likely development site to permanently prevent it from being developed would qualify under this category. This category includes forest protection and conservation easements. Riparian habitat acquisition qualifies under this project type. Property used for dispersion does not qualify under this project type; it is considered a new LID BMP (Project Type 3).

(6) Maintenance with Capital Construction Costs \geq \$25,000

(S5.C.7.a.i.(f)) — This project type applies to [maintenance or](#) repair projects that improve the hydrologic or treatment performance of stormwater facilities. This project type is directly related to Operations and Maintenance Program requirements at S5.C.10.a.ii.(c) which reflects that maintenance projects, including repairs, which require capital construction \geq \$25,000 are not subject to the required 2-year window for completing the maintenance. These projects typically compete with the other types of retrofit projects for limited capital construction funding. Ecology intends that these projects be reflected in the SSC program [in order to](#) provide a comprehensive view of MS4 maintenance activities and requirements. Permittees may develop criteria for identifying maintenance projects that reach the capital construction

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cost threshold on an area-wide or system-wide basis per the requirement in S5.C.7.b.ii.(g). A maintenance project that removes sediment from an existing pond to re-establish the original design volume, will qualify under this project type.

(7) Restoration of Riparian Buffers

(S5.C.7.a.ii.(a)) — This project type describes planting and restoring of riparian buffers above the ordinary high watermark that can reduce the discharge of ~~pollutants, and~~ pollutants and reduce impacts to waters of the state by protecting or restoring hydrologic capacity.

(8) Restoration of Forest Cover

(S5.C.7.a.ii.(b)) — This project type describes planting and restoring of forest cover that can reduce the discharge of ~~pollutants, and~~ pollutants and reduce impacts to waters of the state by protecting or restoring hydrologic capacity.

(9) Floodplain Reconnection Projects on Water Bodies That Are Not Flow Control Exempt Per Appendix 1

(S5.C.7.a.ii.(c)) – Qualifying floodplain reconnection projects will provide flow reduction and runoff treatment benefits.

(10) Permanent Removal of Impervious Surfaces

(S5.C.7.a.ii.(d)) This project type describes permanent removal of impervious surfaces and replacement with pervious vegetated surfaces meeting BMP T5.13 or trees that promote infiltration, dispersion, and uptake by plants or reduce the amount of pollution generating impervious surfaces.

~~(11) Sweeping/Line Cleaning (11) Other actions to address stormwater runoff into or from the MS4 not otherwise required in S5.C (S5.C.7.a.ii.(e)) (previously called “Other actions to address stormwater runoff into or from the MS4 not otherwise required in S5C)~~

Ecology intends this category to encompass the following “enhanced maintenance” projects, not otherwise used to comply with S5.C.10. Limitations and details of specific applications of this project type are provided below.

~~Limitations and details of specific applications of this project type are provided below.~~

Street Sweeping Programs – Ecology intends street sweeping projects to qualify under the SSC program, and be counted toward the SSC minimum level of effort, only if they are above and beyond the sweeping requirements in S5.C.10 Operations and Maintenance. They must be designed, executed, and documented to have the following characteristics:

- Only using a high efficiency sweeper.
- Only street sweeping routes from applicable MS4 service areas can be used to support runoff treatment benefit calculations.

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- The SSC Program Points for a qualifying street sweeping program is based on curb miles or acres swept (as documented through broom use and tracking of parked cars, vegetation, and other conditions that prevent the sweeper from reaching the edge of the roadway) and frequency of sweeping that is in addition to. ~~Ecology added sweeping frequency because qualifying sweeping projects service the same surfaces (e.g., repeat routes swept) more than once per year. Each year this activity qualifies it shall be reported as an individual line item (not summed over the entire tallying period). Implementing the action over a documented route counts as one event. A street sweeping requirements in S5.C.10 Operations and Maintenance Program event that occurs only once per year, or less frequently, does not qualify under the SSC Program.~~

Stormdrain Line Cleaning Programs - SSC Program Points are based solely on line-feet cleaned during the specified ~~time period~~time. Line cleaning of the same section of stormwater conveyance pipe within a 5-year permit cycle does not qualify under the SSC Program. Portions of lines that were inaccessible during line cleaning cannot be included in the calculation. If line cleaning is used to comply with S5.C.10.d.i Catch Basin Inspection Alternative (c), it cannot be counted toward the SSC program.

(12) Watershed Collaboration

(S5.C.7.a.ii.(f)) This project type describes interjurisdictional structural stormwater control projects of any type (#1-11) that are implemented by more than one Permittee. These are projects where either the project area and/or drainage basin, is shared. Permittees can gain SSC Project Points for planning and funding an eligible project type within a watershed that their MS4 contributes. Specific stages of project implementation must be completed: interlocal agreement, funding, and implementation. See below for points provided for these steps.

Non-Qualifying Projects

The following projects and project characteristics DO NOT qualify:

- Projects that do not have a nexus with the current MS4 or do not prevent future MS4 impacts.
- Projects that occur within the receiving water do not qualify, such as:
 - In-channel habitat and stream restoration
 - Fish barrier removal
 - Stabilization of down cutting
 - In-stream culvert replacement
 - Mitigation projects otherwise required to compensate for problems caused by excessive stormwater runoff peak flows and geomorphologically significant flows

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Wetland restoration projects may qualify if existing degraded wetlands are designed to become treatment wetlands in accordance with the SMMWW. Such a project would be a “New Treatment Facility” Project Type (Project type 2).

SSC Program Point multipliers are described in Table 3.

Table 3: SSC Program Point Multipliers

Relevant Project Type #s	Project Achievement Description	SSC Program Point Multipliers
#1 & #4	Flow Control	21.0 times Flow Control Equivalent area
#1 & #4	Flow Control in a known flow control problem area.	31.5 times Flow Control Equivalent area
#2 & #4	Runoff Treatment	24.0 times Runoff Treatment Equivalent area
#2 & #4	Runoff Treatment in a known water quality problem area <u>including High Pollution Generating Area (HPGA)</u> ⁵ .	34.5 times Runoff Treatment Equivalent area
#2 & #4	Achieves Enhanced or Phosphorus Treatment	32.0 times Runoff Treatment Equivalent area
#2 & #4	Meets WQ standards for target pollutant	2.5 times Runoff Treatment Equivalent area
#3	Provides LID Performance (<u>i.e.i.e.</u> , On-site infiltration to manage low flows)	34.5 times LID Equivalent area
#5	Property Acquisition	0.50 times acres acquired
#6 & #11	Maintenance with capital construction costs ≥ \$25,000 or other maintenance actions per S5.C.7.a.ii.(e).	0.25-50 times the acres area served by the maintenance activity*, or 0.125 times (curb miles/ acres swept × (# events/year-1)), or 0.010-025 times the linear feet of lines cleaned-
#7	Restoration of Riparian Buffer	0.35 times acres restored
#8	Restoration of Forest Cover	0.25 times acres restored
#9	Floodplain Reconnection	0.10 times acres reconnected, with a maximum of 200 points
#10	Permanent removal of impervious surfaces	1.0 times the sq. ft. of impervious surface removed

* Previous version of preliminary draft showed this multiplier reduced (i.e. 0.25 to 0.1), it was intended to be increased as shown above.

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Notes:

1. Known water quality problem areas can include High Pollution Generating Areas are areas that drain to a Superfund designated receiving water, areas with arterials (or AADT > 25,000), or areas >50% commercial/industrial or high density developed land use. Reference water quality problem area or HPGA in Comments.
2. Use the appropriate area or length unit (acres, curb miles, linear feet) for Project types 5 through 11. Clearly specify units for area or length in reporting.
- ~~2.3.~~ Multiply SSC point total by ~~1.50-10~~ for completed capital projects related to the MS4 which implement an Ecology-approved basin plan (refer to Permit Appendix 1, Section 7), ~~or~~ Watershed-Scale Stormwater Plan from the 2013 *Phase I Municipal Stormwater Permit*, Special Condition S5.C.5.c, a Stormwater Management Action Plan, ~~or~~ a TMDL (refer to Appendix 2), ~~or~~ an Ecology-approved Adaptive Management Plan (refer to Permit's Special Condition S4F and Appendix 13), or an interlocal watershed agreement. Cite the specific plan associated with the project in the 'Comments' field of Table 1.
- ~~3.~~ 4. Multiply SSC point total by ~~1.50-10~~ for completed capital projects related to the MS4 which occur in overburdened communities. Cite if this factor is used and for which community in the 'Comments' field of Table 1.
- ~~4. Use the appropriate area or length unit (acres, curb miles, linear feet) for Project types 5 through 11.~~

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How to Calculate Equivalent Area

LID Performance Standard (MR#5) Benefit Ratio and Equivalent Area Process

1. Determine the total area (in acres) draining to the project. This is called the “full basin” in these steps.
2. Run the Western Washington Hydrology Model (WVHM), or other approved continuous simulation model, to determine if the BMP meets the LID Performance Standard for the full basin area.
 - If the project meets the LID Performance Standard, the Equivalent Area equals the area draining to the BMP.
 - If the project uses Full Dispersion functionally equivalent to BMP T 5.30 in Chapter 5 of Volume V of the *Stormwater Management Manual for Western Washington*, the Equivalent Area equals the area draining to the BMP.
3. If the project does not meet the LID Performance Standard for the full basin use the Western Washington Hydrology Model (WVHM 2012), or other approved continuous simulation model to calculate the infiltration area of the BMP required to meet the LID Performance Standard Requirement (refer to Permit Appendix 1, Section 4.5) (e.g., match developed discharge durations to applicable pre-developed durations for the range of pre-developed discharge rates from 8% of the 2-year peak flow up to 50% of the 2-year peak flow). Identify the area available for infiltration in the new facility. This is the “required” New/Redevelopment infiltration area for a new BMP project, or the “required” area added through a project that retrofits an existing BMP.
4. Determine the infiltration area provided by the project under consideration. This is the “actual” infiltration area.
5. Divide the actual infiltration area (4) by required New/Redevelopment infiltration area (3) to get the LID Benefit ratio.
6. Multiply the LID Benefit ratio (5) by the full basin area (1) to get LID Equivalent area. The equivalent area cannot be greater than the full basin area.
7. Multiply the LID Equivalent area (6) by the appropriate SSC Program Points to calculate the Flow Control SSC Program Points for the project.

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Runoff Treatment (MR#6) Benefit Ratio and Equivalent Area Process

1. Determine the total area (in acres) draining to the project. This is called the “full basin” in these steps.
2. Use an approved continuous simulation model to determine the required New/Redevelopment Runoff Treatment flow (cfs) or Volume (ac-ft) for the full basin using WWHM 2012.
3. Determine the flow rate or volume provided by the project. This is the “actual” runoff treatment flow rate or volume of a new BMP project, or the “actual” flow rate or volume added through a project that retrofits an existing BMP.
4. Divide the actual flow rate or volume (3) by the full basin required flow rate or volume (2) to get the Runoff Treatment Benefit ratio.
5. Multiply the Runoff Treatment Benefit ratio (4) by the full basin area (1) to get the MR #6 Runoff Treatment Equivalent area. The equivalent area cannot be greater than the full basin area.
6. Identify the appropriate SSC Program Points from Table 3.
7. Multiply the Runoff Treatment Equivalent area (5) by the appropriate SSC Program Points (6) to calculate the Runoff Treatment SSC Program Points for the project.

Flow Control (MR#7) Benefit Ratio and Equivalent Area Process

1. Determine the total area (in acres) draining to the project. This is called the “full basin” in these steps. This area can include basins upstream of the new pond that are upstream of other retention/detention facilities if there is a series of facilities that work together to control stormwater flows.
2. Use an approved continuous simulation model, to calculate the amount of retention/detention storage required to meet the Standard Flow Control Requirement (refer to Permit Appendix 1, Section 4.7) (e.g., match developed discharge durations to applicable pre-developed durations for the range of pre-developed discharge rates from 50% of the 2-year peak flow up to the full 50-year peak flow) for the full basin.
3. Identify the volume of retention/detention at the overflow installed for the project (ac-ft). This is the “actual” retention/detention volume of a new BMP project, or the “actual” volume added through a project that retrofits an existing BMP.
4. Divide the actual retention/detention volume (3) by the full basin required New/Redevelopment retention/detention volume (2) to get the Flow Control Benefit ratio. If the ratio is greater than 1.0, use 1.0 as your Flow Control Benefit ratio.
5. Multiply the Flow Control Benefit ratio (4) by the full basin area (1) to get the Flow Control Equivalent area. The equivalent area cannot be greater than the full basin area.
6. Identify the appropriate SSC Program Points from Table 3.
7. Multiply the Flow Control Equivalent area (5) by the appropriate SSC Program Points (6) to calculate the Flow Control SSC Program Points for the project.

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How to Calculate Area and SSC Points for Small Projects under 1 Acre

The allowance of a program designed to implement small-scale projects that are not planned in advance (S5.C.7.a.iv) is not considered a project type in itself. Instead, those projects are expected to be reflected in the other project type categories as applicable. As noted above, and described in more detail below, small projects can receive SSC points through a simpler point calculation.

This procedure only applies to projects whose total basin area is less than 1.0 acres. Projects with basin areas larger than 1 acre must follow the Equivalent Area Calculation process.

A single project may be eligible to earn SSC points for LID, Runoff Treatment, and Flow Control, based on the water quality benefits provided by the project.

Use the same procedure for each of the applicable LID Performance Standard (MR#5), Runoff Treatment (MR#6) , or Flow Control (MR#7)

1. Determine the total area (in acres) draining to the project. This is called the “full basin”.
2. Multiply the full basin area by the appropriate SSC Program multiplier to calculate the SSC Program Points for the project.

How to Calculate Area and SSC Points for Watershed Collaboration

Watershed collaboration projects receive points for the first two stages:

- 25 points for signed interlocal agreement to carry out SSC project for each participating Permittee
- 50 points for funding commitment for implementation for each participating Permittees

When watershed collaboration projects are **implemented**, each participant will receive points depending on the project type. The area used to calculate points is either:

- 1.) the percentage of the area treated in Permittee jurisdiction or
- 2.) a specific percentage identified in intermunicipal agreement.

The additional watershed plan multiplier can apply to the appropriate area for each Permittee. The appropriate area is either the same as 1.) or 2.) above.