Thurston County Muni Stormwater Permit Compliance Evaluation:

- **Introductions**
  - Ecology
    - Noosheen Pouya
    - Rian Sallee
  - County
    - Zainab Nejati
    - Ryan Langan
    - Tim Wilson
    - Todd Mason
    - Larry Shaffner

- **Overview of the County's SWMP**
  - Great history on the program, good detail provided, thank you!
  - Out of curiosity, what programs does the County implement countywide?
    Examples include programs associated with the County's *Drainage Design & Erosion Control Manual* and LID-related codes, IDDE, public participation, public education & outreach, and the Stormwater Capital Facilities Plan.

    - Thank you. Some counties implement the permit only within boundary required by the permit. It's great that so many programs are implemented countywide!

  - Regional meeting involvement? How has it helped recently?
    Examples of regional meeting involvement include local and regional Permit coordinators meetings, STORM, Regional Environmental Education Partnership (REEP), Stormwater Inspection Group (SWIG), ROADMAP, APWA Stormwater Managers Committee, Interagency Team, Ecology's Water Quality Partnership, Business Inspection Group, and Dumpster Outreach Group.

    A recent example of how this has helped involves the insight gained from the County's involvement in the permittee's Business Inspection Group's survey of current source control business inspection programs. Information complied from those surveys were documented in *Business Inspection Program Report*. This insight has helped inform development of the County's own inspection program.

- **G19 and ESAF**
  - Any updates needed to G19 letters or ESAFs?—Changes in staff?
    No updates needed to G19 letters, ESAFs, or related changes in staff associated with these.

- **Stormwater Planning**
  - Q4a—It's great that the County is actively using internal mechanisms to eliminate barriers to permit compliance.

- o Did a team convene by August 1 2020, to inform and assist in the development and influence of the County's Stormwater Planning program?
  Yes, the County is utilizing its exiting Stormwater Coordination Team, augmented with staff subgroups.
- o How is the County planning for the SMAP requirements?
  The County's approach to SMAP is described Section 3.4 of the County's SWMPP. In summary, we will utilize and build off existing work performed under the *Science to Policy* (STP) project effort.

  - ▪ The Science to Policy project effort was very similar to the SMAP requirement. The County already has elements of this in place, and will be refreshing and adjusting this as necessary to meet the permit requirements.

- o Overall, how is the permit implementation schedule going given COVID-19?
  The Governor's *COVID-19 Stay Home Stay Healthy* order triggered adjustments affecting multiple education and outreach program timelines which, in turn, contributed to delays in meeting the Permit's February 1, 2021 deadline for developing the strategy, schedule, and program evaluation plan.

  - ▪ Action item for Ecology: I will send acknowledgement of the G20 they submitted, and future notifications, as appropriate. This may also be something that we review progress on at our next annual report follow up meeting.

- **Public Education and Outreach**
  - o Q22: Answered N/A— Please tell me about the new behavior change campaign that the County has chosen.
    The County's behavior change campaign will focus on pollution prevention BMPs associated with residential lawn care practices in neighborhoods with Homeowner Associations. Staff will use data from priority audience research conducted in a recent local survey, as well as data from prior regional yard care programs conducted in the North and South Sounds, to inform program development and implementation.
  - o Great examples of education, outreach, and stewardship are mentioned. Out of curiosity, are there usual times of year for some of these events?
    It varies. Some campaigns/programs occur on a seasonal basis, such as tree plantings or field trips to observe spawning salmon. Others occur on an annual basis, such as our regional private stormwater facilities maintenance and inspection workshop. Others are ongoing, such as our free pet waste stations for neighborhoods program.

    - ▪ The County saw success in hosting some virtual workshops in 2020, and may be leaning toward hosting other events this way, as they can reach a wider audience.

- **Public Participation**
  - o Q27—Does the County have any communities that meet the EPA definition of an "overburdened community" (this is defined on page 53 of 56 in the Phase II Permit). (this is defined on page 53 of 56 in the Phase II Permit). What resources did you check to determine this?

During 2020, the County began engaging staff, our Storm and Surface Water Advisory Board, and permittee partners in exploring approaches to effectively engage overburdened communities as well as examine to what extent, if any, the County's stormwater management programs may disproportionately impact certain communities. This includes taking into consideration areas of the County outside the MS4 Permit's geographic scope.

The 2021 REEP work program with our Thurston County Phase II city partners (i.e., Lacey, Olympia, & Tumwater) includes a task to identify overburdened communities within our collective municipal permit boundaries. Among the resources to consider in this undertaking includes: U.S. EPA's EJ Screen, WA State Department of Health's Washington Tracking Network Environmental Health Disparities map, FEMA's National Risk Index (which includes social vulnerability and community resilience data layers), as well as research efforts and strategies already undertaken by other Permittees.

- The County's efforts, and the regional effort through REEP, is great to see. Thank you for providing this detail.

- Are the Storm and Surface Water Advisory Board and County Board meetings available online for the public (either live or after the event)?
Both the Storm and Surface Water Advisory Board and Board of County Commissioners meetings are available online for the public (for more details, click on the corresponding hyperlinked text).

- **Mapping**
  - Q30—Is the attachment you provided a comprehensive list of the County's owned outfalls?
  Yes, those are the know outfalls falling within the geographic scope of the Permit's boundary.
    - The County makes an effort to maintain current information throughout the county, not just in the permit area.

  - Q32—Out of curiosity, will this electronic format for map be made available to the public?
  While the County doesn't publish this type of data, we provide maps upon request.

- **IDDE**
  - Q36 and Q37—MS4 coverage area screened: entire reporting year (starting January 1, 2019; reported as 45%) vs permit effective date through the end of the reporting year (starting August 1, 2019, reported as 100%). Can you confirm that this is correct?
  Correct, we screened 45% of the coverage area during the 2019 calendar year. For the 2020 calendar year, 56% of the coverage area was screened.

- The 100% value represents the County completing their expected percentage of screening during that time period. It would be a significant lift for the County to get information for just the period of August 1-December 31, as the information from their software automatically calculates per calendar year. This screening is done concurrently with all other inspections (catch basins, culverts, ditches, etc).
  - Q39/41—Thank you for the detailed training plan! It's very helpful in understanding how the County implements this program. Does the County involve local law enforcement/fire in these types of training?
    The County continues to explore options to deliver applicable training to sheriff officers. Firefighting services are external to the County's operations and provided by individual Fire Districts.
    - While it may be beneficial to involve fire districts within the County, there are no fire districts that are on County payroll. This may end up being an interesting future opportunity for education and outreach.

  - How is the County planning for new submission through WQWebIDDE?
    The County modified its existing database tracking system to enable us to generate a zipped .xml file that follows the schema prescribed in the Permit.
    - Ecology will be working with permittees in the coming months to understand the issues they are having with this program in order to help troubleshoot, as appropriate.

- **Controlling Runoff from New Dev., Redev, and Construction Sites**
  - How has the involvement in the County planning process (shown in Appendices D and E) been helpful in improving water quality in the County? Are there further improvements that could be made?
    The processes depicted in *Appendices D* and *E* depicts internal processes associated with stormwater-related plan review related to implementation of the County's *Drainage Design & Erosion Control Manual* (not a planning process per se). Last year, through a series of interdepartmental meetings, we further refined the process depicted in *Appendix D*. This also resulted in clarifying internal roles and responsibilities associated with the various steps depicted. This interdepartmental exploration continues to seek opportunities for process improvements during the project review, construction, and post-construction phases.

    - The County has been working toward a more integrated approach to the permit. There has been lots of engagement from the development review and water resources teams. The County has worked on better identifying roles and responsibilities, and ensuring that there are adequate resources. An example of this is how water resources has been engaging development services, in order to ensure applications that are submitted are complete. The challenge that the County is finding now is ensuring that stormwater engineer positions are staffed.

- o Q45—Out of curiosity, what types of projects were the 3 adjustments granted for?
  The County granted variances for three projects proposed by the Washington State Department of Fish and Wildlife to lessen requirements for Core Requirement #6 due to physical constraints. Projects were paving previously gravel surfaces.
- o Q47a—That is quite a few projects to review. What were some common types? Does this include individual housing sites as well?
  The vast majority were single family homes, but also included commercial and residential subdivisions.
- o Q49a—What types of projects were commonly under construction during the reporting year?
  Several subdivisions, some commercial and many single-family homes.
- o Q52—50 enforcement actions taken. What were some common offenses?
  The most common were improper erosion control installation or complete lack of erosion control.
- o Q53—How does the County track their inspections and calculate the percentage achieved?
  The County uses a software package called AMANDA that all County-issued permits and inspections are documented in. We have set our inspection process up so that projects can't be closed out unless we inspect them. In other words, all projects are inspected.

  - ▪ This software, AMANDA, allows the County to keep track of all projects. It also flags any discrepancies in inspections.

- **Operations and Maintenance**
  - o Q61—Does the County inspect all facilities or do they allow private owners to hire 3rd party qualified personnel?
    The County inspects all its facilities, but encourages homeowner associations and commercial businesses to complete and submit inspection reports.

    - ▪ The County allows for the property owners to conduct their own inspections, but the County does go out and verify that inspections are done.

  - o Q66a/b/c—Catch basins: 2,083 catch basins inspected out of 6,019 known catch basins. Permittees should aim to achieve 100% of inspections on 2 year cycles, from August to August (such as 2017-2019, and 2019-2021). Does the County anticipate being on track for the 2019-2021 cycle?
    Yes
  - o Q69—Answered N/A. How does the County plan to document their practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned and maintained by the Permittee, and road maintenance activities under the functional control of the County?
    Thurston County intends to take advantage of the documentation that has already occurred as a condition of maintaining its American Public Works Association (APWA) accreditation status verifying compliance with the recommended practices set forth in APWA's Management Practices Manual. Many of the practices, policies, and procedures are already referenced in the Operations & Maintenance Section of the SWMPP.

- If the County has the documentation in existing, but separate places, this should be sufficient to meet the requirement, as long as this information is readily available to staff when they need it. Ex: All of this information could be kept in field vehicles.

- Q72—How many SWPPPs for facilities does the County have currently? Do you anticipate needing to update any existing SWPPPs?
The County has two SWPPPs associated with facilities requiring them as a condition of our MS4 Permit (i.e., Tilley Campus; Waste and Recovery Center). The SWPPPs are reviewed on a regular basis and updated as needed (Tilley Campus - January 2019; Waste and Recovery Center - July 2020).

- **Source Control for Existing Businesses**
  - How is source control program planning going?
  The County has begun efforts to develop our pool of candidate sites as well as reaching out to glean lessons learned from mature source control programs in other jurisdictions. Efforts have also been initiated to develop code language to support the program.

    - The County had an initial set of data based on SIC codes (6,409 sites). GIS screening allowed them to narrow this down to 700 within their municipal permit boundary, and down to 600 after they determined which businesses mirrored the permit requirements. Their next step is to start ground-truthing. They have an existing program for commercial inspections, that they will be aligning qualifying businesses under the permit with as well. The County has no business licenses, so that makes this effort a bit more challenging. The pandemic has not impacted this process that they are aware of.

- **TMDL Requirements**
  - Q81—Thank you for the detailed attachment. Have any of the requirements under the TMDL been affected by COVID-19? How have you adapted?

    None have been adversely affected by COVID-19 to date or required the need to adapt.

- **Notifications to Ecology**
  - I will provide slides to review types of notifications: G3, G20, S4.F
  - Q88—Answered Yes (G3s)
  - Q90—Answered N/A(S4.F)
  - Q93—Answered N/A (G20s)

- **Next Steps**