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**DEPARTMENT OF RESOURCE STEWARDSHIP
WATER RESOURCES UNIT**

Creating Solutions for Our Future

Cliff Moore
Director

MEMORANDUM

TO: Thurston County Drainage Manual Users

FROM: Mr. Jim Bachmeier 
Thurston County Drainage Manual Administrator

DATE: January 3, 2012

SUBJECT: **Application of Subdivision Land Area Calculations Policy (DECM.11.POL.802) to Large Lot Plats in Rural Areas.**

SUMMARY

Effective immediately, the Drainage Design and Erosion Control Manual (DDECM) Administrator finds that a modification of the application of the Subdivision Land Area Calculations Policy (DECM.11.POL.802) to Large Lot Plats submitted in accordance with Thurston County Code Chapter 18.28 and located outside of urban growth areas and areas subject to the requirements of the Thurston County Phase II NPDES Stormwater Permit is necessary.

BACKGROUND

Thurston County has developed a policy related to land area assumptions (how much of each lot is assumed to be impervious, lawn, landscape, pasture, etc.) to be used for subdivisions of property where the details of the individual lot development are unknown at the time of subdivision application. This policy is generally consistent with what other jurisdictions in the Puget Sound region have done to address this type of project (Pierce County, King County, Ecology, etc.) and based on conversations with Ecology staff (Ed O'Brian, 12/20/2011) this policy is consistent with the correct implementation of the requirements of the Phase II NPDES permit for Thurston County in the urban areas of Thurston County.

Application of the above policy to large lot subdivisions in rural areas, and particularly those plats where no infrastructure construction is being proposed (ie. roads, stormwater facilities, etc.), has recently been questioned by applicants including engineering consultants and developers with suggestions that Thurston County reconsider how we approach stormwater regulations for these types of projects.

Application of the policy to rural large lot plats results in applicants being required to develop drainage plans, maintenance plans, construction stormwater pollution prevention plans and pollutant source control plans and execute stormwater maintenance agreements on projects



where no construction is proposed and the documents prepared are based on only a conceptual design of future lot development. Given the large area available for future building on each lot and the likelihood that actual development on any lot may deviate substantially from the preliminary concepts, the value of the prepared plans at the platting stage of the development is limited and may create overlapping and confusing requirements adding little benefit for water quality.

The Drainage Manual Administrator has consulted with staff in the Water Resources Division of the Resource Stewardship Department and the Development Review Division of the Public Works Department on this issue over the past few months. The Drainage Manual Administrator has concluded that an alternative approach to implementing stormwater requirements for rural large lot plats that is as protective of water quality while reducing the administrative burden to staff and applicants is necessary.

CONCLUSIONS

Commencing immediately, the following approach will apply to implementing stormwater requirements of the Thurston County 2009 DDECM for Large Lot Plats submitted in accordance with Thurston County Code Chapter 18.28 and located outside of urban growth areas and outside the boundary of the Thurston County Phase II NPDES Stormwater Permit.

1. For large lot plats that propose to construct roadways, frontage improvements, or other infrastructure as part of the platting process, the actual proposed construction will be used to establish the thresholds for applicable minimum requirements of the 2009 DDECM.
2. If a large lot plat applicant desires to construct stormwater facilities that will serve some or all of the proposed lots as well as any constructed infrastructure, the policy related to land area assumptions would be applied to the design and sizing of those facilities.
3. The required submittals and application of thresholds for establishing minimum requirements for the management of stormwater runoff from each lot within the proposed large lot plat will be addressed at the time of application for a building, grading, or other permit for construction on the individual lot based on the proposed construction and clearing indicated in the application.
4. For large lot plats where no infrastructure construction is proposed as part of the large lot platting process, an applicant may be required to make a drainage submittal or provide written documentation related to proposed stormwater drainage for the project consistent with Thurston County Code Title 18.28.030 which requires a finding that "The proposed development is designed to avoid drainage problems. To that end, approval of the division may be conditioned on provision of public or private drainage easements, proper location of roads or lot lines, and construction of improvements for drainage control."
5. Stormwater scoping reports will not be required unless the proposed construction associated with the plat excluding individual lot development results in exceeding thresholds for Minimum Requirement #6 (Runoff Treatment) and Minimum Requirement #7, Flow Control of the 2009 DDECM.