July 18, 2016

Dear Stillaguamish River Clean Water District (CWD) Advisory Board members,

Thank you for advising Surface Water Management (SWM) via your annual recommendations letter dated May 2, 2016. We evaluated all of your recommendations as we prepared the proposed SWM 2017 budget. We have responded to these recommendations point by point below to indicate which recommendations were incorporated into the SWM 2017 budget and work plan.

_Pursuant to Title 25A.30.030, Snohomish County Code, the Stillaguamish River Clean Water District Advisory Board (the Board) offers its annual recommendations to Surface Water Management (SWM)._ 

**Recommendation:**

**Stormwater Drainage in the Lower Stillaguamish and Skagit Basins**

The Board has received a joint letter from the Stillaguamish Flood Control District, Drainage District 12, and Diking and Drainage Improvement District 7, requesting Surface Water Management’s assistance for improvements in their drainage networks and to better cope with stormwater run-off from the neighboring uplands.

- The Flood District and DD12 are asking for two actions. First, completion of the long-delayed inventory of their infrastructure, to map and describe each culvert, tide gate, ditch, and other drainage facility, its location, elevation, capacity, and current condition, along with projected costs for necessary upgrades or replacements. Such an inventory would assist them in seeking grant funding. Second, they request technical assistance in calculating the appropriate contribution of each benefited property to the capital and operation costs of the Thomle Road pump station.

- DD7 is requesting replacement of perched, county road culverts that are impeding both farmland drainage and potential fish passage in the DD7 network. These culverts have already been identified in SWM’s 2014 report, Douglas Creek and Vicinity Hydrologic and Hydraulic Modeling. DD7 stands ready to work with SWM to prioritize these replacements in a multi-year effort.

The Board is well aware of the impacts of upland development on these districts, and the ever-rising costs, due to stormwater run-off, silt, debris, and pollution, compared to prior, less-
developed conditions. We recommend that SWM provide these districts with the requested assistance.

Response:

SWM acknowledges the recent requests for assistance from the Stillaguamish Flood Control District (FCD), Drainage District 12, and Diking and Drainage Improvement District 7. We offer responses to these requests below.

- **Inventory of FCD and DD12 infrastructure**: SWM will continue to provide property owners within the Stillaguamish FCD the same services that are provided to property owners across the unincorporated county. These services include technical assistance for drainage and water quality issues, investigation of water quality complaints, and coordination of the flood fight response during river flood events. SWM has conducted – or is in the process of conducting – dike inventories and assessments within seven of the county’s flood control or diking/drainage districts. We plan to perform a dike assessment in the Stillaguamish FCD and DD12 within the next two years. SWM encourages the districts to submit an application to the county’s Flood Damage Reduction Grant Program in 2017 if they wish to pursue funding for a full third-party inventory and engineering analysis of their infrastructure.

- **Thomle Road pump station calculations**: SWM can provide the Flood District and DD12 with technical assistance in their efforts to calculate the appropriate assessment fees associated with the capital and operational costs of the Thomle Road pump station.

- **DD7 county road culvert replacements**: SWM is currently developing a plan to identify and prioritize the replacement of problematic county road culverts, including those identified in the DD7 drainage network in 2014. The culvert replacement projects cited by DD7 are included on the list of potential SWM capital drainage projects; however, given limited CWD funding, the projects are not high enough in priority to be included in SWM’s Six-Year Capital Improvement Program (CIP). We will continue to seek alternative funding sources such as grants to fund the projects in future years.

Recommendation:

**SWM Staffing of the CWD**

The Board no longer enjoys the services of a watershed steward, so that both the CWD Shellfish Protection/Water Quality program and Board staffing are largely tasked to a single individual. This has led to unavoidable delays in Board business, such as Council approvals of new Board members, and preparation of meeting summaries. Also, the informational binders to aid and orientate new members have not been provided in recent years. The Board was told that up to $145,000 could be budgeted to the Shellfish Protection program, but was not needed in 2016 because of the Lower Stillaguamish Pollution Identification and Correction (PIC) grant. **The Board therefore recommends** that additional staffing be funded this year (and fully budgeted for 2017) to assist in the CWD, and we support SWM’s decision to hire an additional planner toward that purpose.

Response:

SWM is aware that staff turnover and unfilled vacancies in our planning group have impacted some of the services that we provide to the CWD. To help address this issue, we recently hired a planner who will work roughly half time to support the Shellfish Protection Program and the CWD Advisory Board.
The planner’s position is fully funded in the 2017 SWM budget.

Regarding informational binders for new Board members, SWM staff assembled updated binders and distributed them at the May 26th CWD Advisory Board meeting.

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**Recommendation:**

*SWM Contract with the Snohomish Health District*

The Board is concerned about the slow progress on finalizing the contract with SHD. Cooperation with SHD plays a key role in achieving our water quality goals, and the contract also provides for their participation on the CWD Board. The Board was assured by SWM that the contract would be timely completed, and we strongly recommend that it be given top priority.

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**Response:**

SWM acknowledges the Board’s concern about progress on the contract with SHD. Internal review of the document has required more time than expected. The contract was forwarded to the Snohomish County Council on June 27th and will likely receive final approval by the Snohomish County Executive in early August.

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**Recommendation:**

*Horse Stable Waste*

Despite some progress by the County and the Snohomish Conservation District (SCD) with horse barn waste management, and the disposal of one particularly troublesome pile, ongoing large accumulations of such waste continue to pose a threat to water quality in the CWD. The Board recommends that SWM survey and evaluate the scale and nature of the problem, not only to better inform clean-up efforts, but to develop, in cooperation with SCD, a written protocol for managing and reducing horse stable waste accumulation.

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**Response:**

SWM shares the Board’s concerns about large accumulations of horse stable waste in the CWD. One way we will address this problem is through our Pollution Source Control program. The goal of the program is to reduce local water pollution by providing commercial property owners with technical assistance and encouraging the adoption of source control best management practices (BMPs). Plans for the program include site inspections of 258 commercial animal handling facilities, including 55 in the Stillaguamish River basin. Dairies and confined animal feeding operations are excluded, as they are regulated by the Washington State Department of Agriculture’s Dairy Nutrient Management Program. The owners of these facilities have already received letters informing them of upcoming inspections. Site visits began in May 2016 and are scheduled to be completed by August 1st in order for Snohomish County to meet its obligations under the Phase I Municipal Stormwater (NPDES) permit.

Information collected during site visits to commercial animal handling facilities will allow us to develop a better understanding of the nature and extent of the horse stable waste problem in the CWD and help inform future waste management efforts. First, as site visits are conducted, data will
be recorded in standard inspection reports. Second, once all of the inspections are complete, information from the site visits will be used to produce a comprehensive report that includes recommendations for addressing animal waste issues. This report will help SWM consider what additional actions might be needed to reduce the accumulation of horse stable waste and whether the additional survey of sites that are not registered as commercial properties is a good next step. We acknowledge that SWM will not be able to collect information on all commercial animal handling facilities targeted for inspection, as some landowners may refuse to allow inspectors to access and evaluate their properties. As of mid-July, however, only two of the 258 property owners notified of impending inspections have denied entry to SWM staff or opted out of the Pollution Source Control program. SWM is willing to consider and discuss with the Board potential next steps in addressing commercial and non-commercial animal handling facilities, but we would prefer to wait until this initial report is completed before determining the appropriate path forward.

Another way SWM will address the horse stable waste problem is by continuing to partner with SCD to help provide landowners with resources and technical assistance. For example, as part of the Pollution Source Control program, we will follow a site referral process that was established through the cooperative efforts of SWM and the district. As SWM inspectors evaluate commercial properties for compliance with water pollution control regulations, they will actively encourage property owners who need to take corrective action to contact SCD for more detailed technical assistance and farm planning services. Once a specific site is referred to SCD, district staff will keep SWM updated on the status of the referral and notify us when an inspector can carry out a follow-up site visit to verify compliance.

Finally, SWM will collect information on the horse stable waste problem when we respond to water quality complaints from the public and partner agencies. Many of the complaints we receive involve horse/animal waste. SWM will continue to respond to such complaints in 2017.

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**Recommendation:**

_Lake Wise_

_The Board thanks SWM for its fine work with the residents of Lake Ketchum, and for the expansion of the Lake Wise program to include three CWD lakes. We support the continuation of these programs, as well as the 2016 Lake Wise communication plan for education, outreach and certification, including reminders to encourage regular septic system maintenance._

**Response:**

SWM is proud of the successful outcomes we have achieved through the LakeWise program. We look forward to partnering with lakeside property owners on future efforts to reduce lake pollution and to improve fish and wildlife habitat. SWM will continue to carry out the LakeWise communication plan and will send postcard reminders to program participants who have committed to regular inspections and maintenance of their septic systems.

Thank you again for your thoughtful recommendations to SWM. We hope our responses will inform the development of your annual recommendations letter to the Snohomish County Council. We look forward to continuing to work with the CWD Advisory Board to help refine and further improve the important programs funded by CWD revenues.
Sincerely,

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cc: Steve Thomsen, P.E., Snohomish County Public Works Director
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