

Stillaguamish River Clean Water District Advisory Board

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April 29, 2013

Debbie Terwilleger, Director
Snohomish County Public Works, Surface Water Management
3000 Rockefeller Ave, MS607
Everett, WA 98201

RECEIVED

MAY 01 2013

SURFACE WATER MGMT.

Dear Ms. Terwilleger,

Pursuant to Title 25A.30.030 of the Snohomish County Code, the Stillaguamish River Clean Water District Advisory Board (the Board) offers the following comments and recommendations to Snohomish County Surface Water Management (SWM), regarding the 2014 work plan and budget, and concerning the immediate issues that have arisen from Snohomish County Ordinance 13-009.

Funding for RCW 90.72 Programs

The 47% reduction in RCW 90.72 Shellfish Protection revenue caused by Ordinance 13-009 poses a serious challenge to our mission and identity as a Clean Water District (CWD). RCW 36.89 revenue saw a 2% cut. The Board supports your plan for 2013, as presented to the Finance Committee, to manage the impact of these cuts through SWM budget reallocations and aggressive use of CWD fund balances. Nevertheless, this is a short-term remedy that still includes substantial budget cuts, particularly to the Discretionary Fund, and if continued through 2014, would leave our fund balances largely depleted. The upcoming SWM Service District Reassessment Study cannot be expected to enable a solution until 2015 at the earliest.

The percentages of CWD fees as currently allocated to 90.72 and 36.89 are 25% and 75%, respectively, pursuant to the fee structure table of Title 25A.20.030(2). The Finance Committee has proposed to you that SWM could draft an amendment to this table, shifting these percentages, to 30% and 70% for example, to restore in large part the 90.72 revenues by effectively sharing the recent cut more equitably, as a percentage reduction, between the two funds. To assure long-term viability of CWD shellfish protection and water-quality programs, **the Board recommends** that SWM propose to Council such an amendment, to be effective in 2014.

White Horse Trail

We believe the White Horse Trail and other county parks property within the Clean Water District should be assessed CWD fees similarly to the policy for privately owned properties and privately-owned rail beds, given that they present the same problems in terms of impervious surface and obstruction of surface water flows and contaminant contribution. **The Board recommends** that the Snohomish County Parks Department be assessed accordingly.

Referral and Compliance

In our most recent letters to the Snohomish County Council and the Snohomish Conservation District, the Board has recommended improved cooperation between the County and the Washington Department of Ecology for effective enforcement in the referral and compliance process. This position is also reflected in the attached Local Integrating Organization (LIO) survey of Board members (see item "LIO Survey" below) regarding small agricultural operations. **The Board requests** an update on the status of your stated effort "to clarify roles and responsibilities" regarding these agricultural water quality problems. **We also request** a report on the efficacy of the ½ FTE budgeted to assist the Snohomish County Planning and Development Services Department in improving the County's referral and compliance process. **The Board recommends** your active attention to this issue.

Lakes

Milfoil and toxic algae remain serious threats to the lakes in the CWD, and the Board recommends continued efforts to control them. You previously reported making a shift to greater use of herbicides for milfoil control, and mentioned possible revised diving guidelines from the Washington Department of Labor and Industries and a potential increase in the Aquatic Plant fees for Lakes Goodwin and Shoecraft. **The Board requests** an update on this effort. We wish to thank SWM for its support of the funding process for the proposed toxic algae control project on Lake Ketchum. **The Board also requests** an update on the status of the Lake Howard "Lakewise" pilot project.

Stormwater

The Board supports your ongoing study in the Douglas Creek watershed, recognizing the nexus between maintaining water quality and stabilizing upland run-off, not only in the Stanwood area but throughout the CWD. Again, this position is reflected in the attached LIO survey of Board members.

LIO Survey

For your information, we have attached a copy of the LIO Survey taken by eight members of the Board, which indicates their positions on priorities for the action items update for the Puget Sound Partnership Near Term Actions.

The Board thanks you for considering our recommendations and comments, and for your consistent responsiveness to our concerns. We look forward to receiving your written response by July 1, 2013.

Respectfully,



Steve Van Valkenburg, Chair



Gina Gray, Vice Chair

Cc: Snohomish County Executive's Office

Stillaguamish and Snohomish Strategies Update

Updated 3/4/2013

Priority Action Items for Stillaguamish River Clean Water District Advisory Board (8 members responded)

Top choice

A.3.5 (18)

Continue to work cooperatively with farming community to develop a coordinated restoration and mitigation strategy that balances the need of agriculture, fish, and flood protection

Second Choice

C.2.X (11)

Support local efforts to reduce nutrient runoff into surface waters (lakes, streams, rivers)

Third Choices

A.11.1 (16)

Continue local efforts to identify and eradicate invasive species impairing habitat and agricultural productivity

C.5.1 (56)

Support local efforts to identify and control sources of pollution from on-site-septic systems (OSS)

D.5.X (5,4) D.6.X (4,5) D.7.X (4,5)

Increase landowner awareness of environmental stewardship as it relates to water quality within the Stillaguamish River Clean Water District

Fourth Choices

C.3.3 (34)

Implement strategies to keep livestock out of streams

C.9.2 (60)

Work with local pollution sources to reduce pollution loading into Puget Sound

Fifth Choices

A.3.4 (39)

Integrate small farms (such as horse farms or grass-fed beef farms) into current programs

C.2.4 (37)

Implement upland stormwater projects that reduce the impact of stormwater and pollutants on flood plain activities

#	Local Strategies and Sub-Strategies (Action Items)
A	Protect and Restore Terrestrial and Freshwater Ecosystems
A.1	Focus Land development away from ecologically important and sensitive areas
A.1.1 (59)	Use and increase site-appropriate low impact development (LID) techniques to manage for future and improved practices
A.1.2 (51)	Solidify wetland protection, connection, and restoration components as part of stormwater retrofits in Comprehensive Plans by 2015, to create increased water storage in agricultural fields and decrease runoff
A.2	Protect and restore upland, freshwater, and riparian ecosystems
A.2.1 (41)	Protect intact mainstream rivers
A.2.2 (42)	Protect unique rearing and spawning areas and important shorebird habitat
A.2.3 (24)	Identify and protect 100% of existing unarmored shoreline
A.2.4 (25)	Implement acquisition projects to protect intact habitat and/or purchase high priority sites for *protection and/*or future restoration
A.3	Protect and steward ecologically sensitive rural resource lands
A.3.2 (12)	Support property tax incentive programs
A.3.X (10)	Provide technical assistance to residents
A.3.3 (46)	Provide technical assistance to landowners of working lands
A.3.4 (39)	Integrate small farms (such as horse farms or grass-fed beef farms) into current programs
A.3.5 (18)	Continue to work cooperatively with farming community to develop a coordinated restoration and mitigation strategy that balances the need of agriculture, fish, and flood protection
A.3.8 (53)	Support and implement food security strategies that foster the long-term protection of working farms
A.3.9 (51)	Solidify wetland protection, connection, and restoration components as part of stormwater retrofits in Comprehensive Plans by 2015, to create increased water storage in agricultural fields and decrease runoff
A.3.10 (21)	Encourage the local and organic food movements: Farm Link connects Snohomish Farm Incubator graduates with local properties to encourage incoming farmers to promote stewardship and environmentally friendly techniques. (Puget Sound Fresh also promotes local produce organic farms and community supported agriculture (CSAs))
A.3.X (7)	Monitoring freshwater ecosystems to identify status and trends
A.4	Encourage compact regional growth patterns and create dense, attractive and mixed-use and transit-oriented communities
A.5	Protect and restore floodplain function
A.5.X (13)	Voluntary incentives to encourage communities to adopt floodplain management programs and regulations exceeding the minimum National

	Flood Insurance Program requirements
A.5.1 (28)	Implement large-scale floodplain projects to remove bank armoring, re-connect side channels and provide mainstream rivers with ability to migrate and create diverse instream habitat
A.5.2 (15)	Complete necessary modeling and planning coordinating flood management and habitat improvement
A.6	Protect and recover salmon
A.6.1 (31)	Implement the Salmon Recovery three-year plan (WRIAs 3, 4, 5, 6, 7)
A.6.X (26)	Implement actions from the Port Susan Marine Stewardship Area plan where salmon are a target
A.7	Protect and conserve freshwater resources to increase and sustain water availability for instream flows
A.7.1 (27)	Implement flow rules and programs in all basins
A.7.X (3)	Implement groundwater management program for protection of groundwater resources and Underground Injection well assessments for rural areas.
A.	Adapt, where necessary, and implement and maintain freshwater and upland restoration projects
A. (31)	Implement the Salmon Recovery three-year plan (WRIAs 3, 4, 5, 6, 7)
A. (30)	Implement restoration components of the shoreline management plans
A.	Mitigation that works
A. (9)	Participation of habitat biologists on project teams for review of habitat restoration projects
A. (6)	Monitor past restoration projects to assess project success
A.	Implementation of other plans in a coordinated way and maintenance and enhancement of biodiversity
A.11	Prevent and respond to the Introduction of freshwater and terrestrial invasive species
A.11.1 (16)	Continue local efforts to identify and eradicate invasive species impairing habitat and agricultural productivity
B	Protect and Restore Marine and Nearshore Marine Ecosystems
B.1	Use anticipated population and economic growth as a catalyst for recovery by building on existing efforts to establish protection and restoration priorities
B.2	Protect and conserve relatively intact ecosystems to maintain the Health of Puget Sound
B.3	Implement and maintain priority nearshore and marine ecosystem restoration projects
B.4	Support economic viability of working waterfronts to help maintain ecosystem function and sustain quality of life
B.5	Improve public access to Puget Sound
B.6	Protect and recover marine nearshore species
B.7	Prevent and respond to the introduction of marine invasive species

C	Reduce and Control the Sources of Pollution to Puget Sound
C.1	Prevent, reduce and control the source of toxic contaminants entering Puget Sound
C.1.1 (38)	Implement Watershed Management Plan addressing Temperature, dissolved oxygen, mercury, and bacterial impairments. Encourage collaboration between agencies and watershed groups.
C.1.2 (54)	Support hazardous waste education/technical assistance programs
C.1.3 (50)	Remove all project area waters from the 303(d) list for fecal coliform and nutrients and agri-chemicals from entering project area waters by 2015
C.1.4 (40)	Prevent introduction of any agri-chemicals into surface waters from commercial/ residential landscaping by 2015
C.2	Use a comprehensive approach to manage urban and rural stormwater runoff at the site and landscape scales
C.2.X (29)	Implement NPDES permits
C.2.X (48)	Public stormwater retrofits in rural areas
C.2.X (57)	Support site appropriate LID and LID retrofits rural sub-basins (including rain gardens)
C.2.4 (37)	Implement upland stormwater projects that reduce the impact of stormwater and pollutants on flood plain activities
C.2.X (11)	Support local efforts to reduce nutrient runoff into surface waters (lakes, streams, rivers)
C.3	Prevent, reduce and control agricultural runoff
C.3.1 (45)	Provide support for technical assistance and cost-share programs for small farms and commercial agriculture to improve and integrate agricultural nutrient management
C.3.2 (51)	Solidify wetland protection, connection, and restoration components as part of stormwater retrofits in Comprehensive Plans by 2015, to create increased water storage in agricultural fields and decrease runoff
C.3.3 (34)	Implement strategies to keep livestock out of streams
C.3.5 (61)	Provide technical resources for off-stream watering of livestock
C.4	Prevent, reduce, and control surface runoff from forest lands
C.5	Prevent, reduce and/or eliminate pollution from decentralized wastewater treatment systems
C.5.1 (56)	Support local efforts to identify and control sources of pollution from on-site-septic systems (OSS)
C.6	Prevent, reduce and/or eliminate pollution from centralized wastewater treatment systems
C.7	Abundant, healthy shellfish for ecosystem health and for commercial, subsistence and recreational harvest consistent with ecosystem protection
C.7.1 (32)	Implement shellfish protection programs
C.7.2	Explore opportunities to open shellfish areas that are conditionally closed by

(22)	Washington Department of Health
C.7.X (20)	Develop strategies for sediment and hydrologic changes that will affect shellfish. Develop further science that identifies the key threats to climate change on shellfish and seek to implement actions that mitigate these threats
C.7.X (17)	Continue to implement programs that improve water quality and prevent toxics loading
C.8	Effectively prevent, plan for and respond to oil spills
C.8.1 (35)	Implement the Marine Resources Committee's tiered recommendations for Snohomish County oil spill response and prevention
C.8.X (1)	By 2014 orchestrate local, state, and federal response to mitigate unintended damages from spill response impacts to freshwater and marine habitats
C.9	Address and Clean Up Cumulative Water Pollution Impacts in Puget Sound
C.9.2 (60)	Work with local pollution sources to reduce pollution loading into Puget Sound
D	Sustain, Coordinate, and Adapt Puget Sound Recovery Efforts
D.1	Provide the leadership frameworks to guide the Puget Sound recovery effort and set action and funding priorities
D.2	Support and build strategic, collaborative partnerships
D.2.1 (55)	Support integration of species recovery, water quality, aquatic reserve and natural resource management plans, shoreline master programs, and Marine Resource strategies; start with salmon recovery, Marine Resource Committee, and water management plans
D.3	Implement performance management
D.4	Coordinate and advance science monitoring
D.4.X (2)	Develop a geographically-based landscape approach to systematically address and improve temperature regime in Stillaguamish basin to assess, prioritize, and implement actions
D.4.X (7)	Monitoring freshwater ecosystems to identify status and trends
D.4.X (8)	Monitoring river flow
D.5	Cultivate broad-scale practices and behaviors among Puget Sound Residents that benefit Puget Sound
D.5.1 (14)	Citizen science programs
D.5.X (5,4)	Increase landowner awareness of environmental stewardship as it relates to water quality within the Stillaguamish River Clean Water District
D.5.5 (47)	Provide technical assistance, at appropriate levels, to residents interested and able to improve the health of Puget Sound
D.5.8 (49)	Publicize multiple benefits of practices and behaviors of priority stewardship practices, including personal benefits
D.6	Build Issue Awareness and Understanding that fosters beneficial practices and behaviors and removes institutional barriers to those practices
D.6.1 (33)	Implement STORM group recommendations
D.6.X (4,5)	Increase landowner awareness of environmental stewardship as it relates to water quality within the Stillaguamish River Clean Water District.

D.7	Build Social and Institutional Infrastructure that fosters beneficial practices and behaviors and removes institutional barriers to those practices
D.7.X (4,5)	Increase landowner awareness of environmental stewardship as it relates to water quality within the Stillaguamish River Clean Water District
D.7.2 (52)	Support and enhance existing infrastructure and organizational capacity to engage and enhance stewardship activities (volunteerism, property management stewardship, etc.)
D.7.3 (19)	Develop enhanced relationships with local print media journalist to generate more Puget Sound related articles
D.7.4 (23)	Gather and distribute results of multiple audience research efforts to outreach and education practitioners
D.7.5 (44)	Provide periodic natural resource updates/science to elected officials
D.7.7 (33)	Implement STORM group recommendations
D.7.8 (43)	Provide outreach to Stillaguamish area residents on current problems in Puget Sound
D.7.10 (58)	Support youth education efforts that provide Puget Sound ecosystem curriculum or connections with personal action impacts
D.8	Develop and secure stable and diverse sources of funding to implement Action Agenda Priorities
D.9	Climate Change information and adaptation