

## Public Comments on 2021 Drainage Manual Discussed at September 9, 2021 Public Presentation

The Snohomish County Department of Conservation and Natural Resources (DCNR) received 45 public comments regarding the Snohomish County’s Drainage Manual updates that went into effect July 1. Snohomish County implemented one comment, related to bioretention plant requirements, in the 2021 Drainage Manual. Implementation of 34 comments would require Washington State Department of Ecology approval, which can’t be obtained before Ecology issued further regulatory revisions in 2024. However, implementation of the remaining 10 comments would not require Ecology approval, and the county has given more consideration to these. Below is a summary of the comments the county has given more consideration to.

Summary of Public Comments	Response
<p><u>Additional information or examples</u></p> <ul style="list-style-type: none"> <li>• Please provide an example of the modeling and calculations to meet Minimum Requirement 8 – Wetlands Protection. (Volume I, p. 28-31)</li> <li>• Will dispersion from stormwater facilities be allowed to discharge to a wetland buffer? (Volume I, p. 30)</li> <li>• Need more explanation or examples on how to comply with requirement that “flows from the additional areas that are naturally attenuated by the project site under predeveloped conditions must remain attenuated, either by natural means or by providing additional on-site detention so that peak flows do not increase.” (Volume III, p. 10)</li> </ul>	<p><u>County response</u></p> <ul style="list-style-type: none"> <li>• County believes existing Drainage Manual text provides good regulatory language.</li> <li>• PDS will contact the people who made these comments to discuss their concerns, and if needed will create guidance documents.</li> </ul>
<p><u>Additional document submittals</u></p> <ul style="list-style-type: none"> <li>• Provide all field notes, photographs, and records to document Pilot Infiltration Test per Volume III-3.3.6 to be used to determine the predeveloped soil condition. (Volume I, p. 33)</li> <li>• Pilot Infiltration Test (PIT) data documentation: the engineer performing either the small or large PIT shall keep accurate field notes documenting the following: (1) Name, phone number, firm name and address performing the PIT; (2) Accurate survey location of the PIT including elevation of the bottom of the PIT excavation to the project datum shown on the project drawings; (3) Measured dimensions of the PIT; (4) Start and stop times of the pre-soak prior to running the PIT; (5) Measured draw downs and time of measurements; (6) Water source for the PIT (e.g. Water Truck, Municipal Fire Hydrant, etc.); (7)</li> </ul>	<p><u>County response</u></p> <ul style="list-style-type: none"> <li>• County believes existing documentation is adequate for review of drainage plan submittals.</li> <li>• No further change to Drainage Manual at this time.</li> </ul>

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<p>Gallons of water used while running the PIT, using an approved water meter; (8) Photographs taken during the PIT to document readings and soil conditions. The engineer shall include copies of the actual field notes, photographs and any other documentation recorded during the PIT and include those notes as an attachment to the Drainage Report. (Volume III, p. 51)</p> <ul style="list-style-type: none"> <li>• Require submittal of both electronic *.whm and full length, unabridged hard copy *.pdf files for hydrologic analyses using continuous runoff hydrologic modeling. (Volume I, p. 39)</li> <li>• Require the horizontal and vertical locations of all geotechnical investigations to be accurately shown on the drainage design drawing, in the project datum. Rim elevations or depth of test pit excavation shall be noted on the drainage drawing. The design engineer shall include on the drawings the measured depth below grade, date, and elevation using the project datum to show seasonal high groundwater. (Volume III, p. 48)</li> </ul>	
<p><u>Additional actions or certifications</u></p> <ul style="list-style-type: none"> <li>• Require that all test pits, piezometers, monitoring wells, and borings shall be surveyed by a land surveyor licensed in the State of Washington. (Volume III, p. 48)</li> <li>• Require the preparer of a Construction Stormwater Pollution Prevention Plan (SWPPP) to be a professional civil engineer and a currently Certified Erosion and Sediment Control Lead (CESCL) listed in Ecology’s database. (Volume II, p. 9)</li> </ul>	<p><u>County response</u></p> <ul style="list-style-type: none"> <li>• County believes existing requirements for geotechnical report content are adequate.</li> <li>• CESCL requirement is not needed for plan preparation; plans must be stamped by a licensed engineer.</li> <li>• Project sites of one acre or more require CESCL onsite or on call 24/7.</li> <li>• CESCL is responsible for compliance with all erosion/sedimentation control regulations.</li> <li>• No further change to Drainage Manual at this time.</li> </ul>

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<p><u>Bioretention facilities – Four-foot fencing</u></p> <ul style="list-style-type: none"><li>• Require bioretention facilities in residential developments to have minimum four-foot fencing capable of preventing access by domestic pets, with locked gates for maintenance access. (Volume V, p. 73)</li></ul>	<p><u>County response</u></p> <ul style="list-style-type: none"><li>• Measures for mitigating foot traffic can be reviewed on case-by-case basis during drainage review.</li><li>• No further change to Drainage Manual at this time.</li></ul>
<p><u>Bioretention facilities – informational signs</u></p> <ul style="list-style-type: none"><li>• Require signs at all bioretention facilities notifying people of the importance and function of bioretention facilities. (Volume V, p. 73)</li></ul>	<p><u>County response</u></p> <ul style="list-style-type: none"><li>• County is assessing options for sign requirements.</li><li>• Requirements would be adopted as revision to Drainage Manual.</li></ul>