

SUMMARY and FISCAL NOTE

Department:	Contact Person/Phone:	Executive Contact/Phone:
SPU	Sherell Ehlers (Project Mgr)/6-4576	Aaron Blumenthal/3-2656
DPD	Ede Courtenay/3-9679	
SDOT	Maureen Meehan/4-8750	
Parks	Becky Rufin/3-3870	

1. BILL SUMMARY

Legislation Title: AN ORDINANCE relating to the Stormwater Code; amending Chapters 22.800, 22.801, 22.802, 22.803, 22.805, 22.807, and 22.808 of the Seattle Municipal Code and adding a new Section 22.800.100.

Summary and background of the Legislation:

The purpose of the City of Seattle’s Stormwater Code (Chapters 22.800 – 22.808 SMC) is to protect life, property, public health, and the environment from the adverse impacts of urban stormwater runoff. These can include flooding, water quality pollution, landslides and erosion. The Stormwater Code was substantially updated in 2009, and there were three minor revisions in 2015. Whereas the 2009 Stormwater Code update included several major modifications with significant cost impacts to the City and developers, this 2016 Stormwater Code Update consists of relatively less significant modifications with fewer cost impacts.

The Stormwater Code and associated joint Seattle Public Utilities/Department of Planning and Development (SPU/DPD) Directors’ Rules are being revised to comply with the requirements of the City’s coverage under the 2013-2018 Phase I Municipal Stormwater Permit (MS4 Permit). The MS4 Permit was issued by the Washington State Department of Ecology under both the National Pollutant Discharge Elimination System (NPDES) program established by the federal Clean Water Act and the State of Washington Water Pollution Control Law. The MS4 Permit was issued on August 1, 2012, became effective on August 1, 2013, and was modified effective January 16, 2015. The MS4 Permit requires the City’s Stormwater Code and associated Stormwater Manual (to be contained in the Directors’ Rule) include minimum requirements, thresholds, definitions, and other requirements, limitations, and criteria, determined by Ecology to be equivalent to Appendix 1 of the MS4 Permit for new development, redevelopment, and construction. In addition, maintenance provisions must be at least as protective of facility function as, and source control provisions must be functionally equivalent to, Ecology’s Stormwater Management Manual for Western Washington. A draft of the Directors’ Rule is included as Exhibit C.

SPU, in close collaboration with DPD, other City departments, and external stakeholders, is updating the Stormwater Code to: 1) incorporate new Ecology requirements; 2) incorporate policy changes; and 3) improve usability. All updates to Seattle’s Stormwater Code were originally intended to occur at one time with an effective date of June 30, 2015. However, Ecology was delayed in reviewing the City’s draft Stormwater Code, which prevented Seattle from making all modifications on the original timeline and extended the City’s regulatory

deadline by several months. Nevertheless, Seattle wanted to make three cost-saving Stormwater Code modifications effective by the originally anticipated effective date. Therefore, updates to the Stormwater Code are proceeding as two legislative processes: the now-approved “2015 Revision to Stormwater Code” (effective date 5/24/15) and the “2016 Stormwater Code Update” enacted by this proposed legislation (anticipated effective date 1/1/16).

Several modifications are being proposed in the 2016 Stormwater Code Update. Exhibit A (attached) summarizes significant proposed modifications and their rationale. The following list includes only those proposed modifications with notable financial impacts to the City of Seattle:

1. Definition of "Pollution-generating pervious surface" (Chapter 22.801 SMC).
Proposed modification required by Ecology includes adding “natural and artificial turf” as typical pollution-generating pervious surfaces requiring water quality treatment for 0.75 acres or more of new or replaced turf.

2. Minimum Requirements for Projects (Chapter 22.805 SMC). Modifications are proposed for all development projects to meet Ecology’s minimum requirements and account for Seattle’s unique development patterns. The primary proposed Stormwater Code modifications include:
 - a. “Implement GSI” Becomes “On-site Stormwater Management”. The requirement for projects to perform On-site Stormwater Management (currently “implement green stormwater infrastructure” in the current Stormwater Code) has been moved from the Minimum Requirements for All Projects and is now included as a requirement based on project type (i.e., Single-family residential (SFR), Trail/Sidewalk, Roadway, Parcel). Use of On-site BMPs, such as permeable pavement and bioretention facilities, result in volume reduction to the City’s systems thus leading to additional downstream flood protection and increased system capacity. In accordance with the MS4 Permit, the 2016 Stormwater Code Update specifies projects must either match a quantitative on-site performance standard or install on-site best management practices (BMPs) per a pre-defined list as feasible. Similarly, the requirement to amend soils is relocated from its own specific provision, to now be included based on project type (i.e., Single-family Residential, Trail/Sidewalk, Parcel-based, Roadway).
 - b. On-site Stormwater Management Threshold for SFR Projects. The threshold for applicability of On-site Stormwater Management would change from applying to all single-family residential projects with a credit for the first 1,500 square feet, to applying to single-family residential projects with no credit as follows:
 - i. For a project on a lot most recently created, adjusted, altered, or otherwise amended by a plat or other lawful document recorded with the King County Recorder on or after January 1, 2016, and where that document either created the lot or reduced the size of the lot, either the total new plus replaced hard surface is 750 square feet or more or land disturbing activity is 7,000 square feet or more; or
 - ii. For all other projects where either the total new plus replaced hard surface is 1,500 square feet or the land disturbing activity is 7,000 square feet or more.

- c. On-site Stormwater Management Threshold for Parcel-based Projects. The threshold for applicability of On-site Stormwater Management is proposed to change from applying to all Parcel-Based projects with 2,000 square feet of impervious surface, to applying to Parcel-Based projects as follows:
 - i. For a project on a lot most recently created, adjusted, altered, or otherwise amended by a plat or other lawful document recorded with the King County Recorder on or after January 1, 2016, and where that document either created the lot or reduced the size of the lot, either the total new plus replaced hard surface is 750 square feet or more or land disturbing activity is 7,000 square feet or more; or
 - ii. For all other projects where either the total new plus replaced hard surface is 1,500 square feet or the land disturbing activity is 7,000 square feet or more.
 - d. Public Roadway Right-of-Way Projects. New language is proposed to account for the unique construction limitations posed by public roadway right-of-way work within an urban environment having existing infrastructure (i.e., hydraulic conditions, existing major utilities). The new language reduces flow control and water quality treatment requirements for roadway projects under limited conditions.
3. Minimum Requirements for On-Site Stormwater Management (22.805-070 SMC). Modifications to the Stormwater Code are proposed to meet Ecology’s minimum requirements. Additional project site infiltration testing and feasibility analyses are required to meet Ecology’s minimum requirements and are proposed in the 2016 Stormwater Manual. The primary proposed Stormwater Code changes include:
- a. Right-of-Way: For projects draining to a creek, wetland, or small lake that trigger On-Site Stormwater Management, Ecology does not allow a prohibition to installation based on minimum facility size for permeable pavement (2,000 square feet) and bioretention (500 square feet) as is allowed in the current Seattle Stormwater Manual. This will result in additional small facilities within the right-of-way.
 - b. List vs. “Cafeteria-Style” Selection: Ecology requires a prescriptive list approach as opposed to the current cafeteria-style approach when determining which on-site stormwater BMPs must be used. In addition, cost feasibility will no longer be a consideration for most On-site Stormwater Management BMPs.

3. SUMMARY OF FINANCIAL IMPLICATIONS

This legislation has direct financial implications.

This legislation does not have direct financial implications.

Budget program(s) affected:				
Estimated \$ Appropriation change:	General Fund \$		Other \$	
	2015	2016	2015	2016
Estimated \$ Revenue change:	Revenue to General Fund		Revenue to Other Funds	
	2015	2016	2015	2016
Positions affected:	No. of Positions		Total FTE Change	
	2015	2016	2015	2016
Other departments affected:				

Summary Notes: This legislation does not directly appropriate funds. No additional resources or appropriations are being requested at this time. However, if additional resources and/or appropriation authority is needed to support preparation activities in advance of the 2016 implementation, the impacted department will bring forward a supplemental budget request prior to the end of this year. Any changes to 2016 endorsed positions, appropriations or revenues will be handled through the budget process by each impacted department. 2015 and 2016 anticipated direct financial implications are addressed in the notes to the Appropriations and Revenues/Reimbursements sections of this fiscal note with indirect and longer term implications noted in the Other Implications sections.

3.a. Appropriations

This legislation adds, changes, or deletes appropriations.

Fund Name and number	Dept.	Budget Control Level Name/#*	2015 Appropriation Change	2016 Estimated Appropriation Change
TOTAL				

*See budget book to obtain the appropriate Budget Control Level for your department.

Appropriations Notes:

2015: Additional training for SPU, DPD, SDOT, and Parks staff will be required in 2015 to prepare for implementation of the Code in 2016. These departments are unlikely to need

additional appropriations in 2015. If additional appropriation is needed the affected department will bring forward a supplemental budget request prior to the end of 2015.

2016: DPD anticipates additional staffing requirements as a result of the code update due to a sizeable increase in the number of projects requiring on-site drainage review and the increased complexity of on-site inspections. As part of the 2016 budget process, DPD will request an additional \$569,778 in annual appropriations to fund requests for 2 additional FTE Drainage Reviewers (\$258,426 annual total or \$129,213 per reviewer) and 2 additional FTE DPD Site Inspectors and associated vehicles (\$311,352 annual total, or \$155,676 per reviewer and vehicle).

As required under the DPD-SPU MOU, SPU will reimburse DPD for the portion of the work carried out by the new staff related to side sewer permitting and authorized overhead activities. As part of the 2016 budget process, SPU will request an additional \$293,400 (N000 General Expense) in 2016 appropriations (\$293,400 for N000 General Expense) to fund this additional work.

Indirect and long-term financial implications of the proposed legislation to SPU and other departments are specified in the Other Implications section of this fiscal note.

3.b. Revenues/Reimbursements

_____ This legislation adds, changes, or deletes revenues or reimbursements.

Anticipated Revenue/Reimbursement Resulting from this Legislation:

Fund Name and Number	Dept.	Revenue Source	2015 Revenue	2016 Estimated Revenue
TOTAL				

Revenue/Reimbursement Notes:

This legislation does not revise budgeted revenue. As a result of the Stormwater Code update, DPD anticipates increased hours spent on site inspections for side sewer permits (see Appropriations notes above). The payments by permit applicants are transferred to SPU as side sewer permitting revenues. Any projected revisions to 2016 SPU endorsed revenues due to these increased site inspection charges will be addressed through the budget process.

3.c. Positions

— This legislation adds, changes, or deletes positions.

Total Regular Positions Created, Modified, or Abrogated through this Legislation, Including FTE Impact:

Position # for Existing Positions	Position Title & Department*	Fund Name & #	Program & BCL	PT/FT	2016 Positions	2016 FTE	Does it sunset? (If yes, explain below in Position Notes)
TOTAL							

* List each position separately

Position notes: This legislation does not authorize the addition of positions. It will not result in any increase to SPU positions. DPD anticipates position requests related to the code update for 2 additional FTE Drainage Reviewers and 2 additional FTE DPD Site Inspectors as further described in the notes to the Appropriations section of this Fiscal Note. These positions will be requested during the 2016 budget process.

4. OTHER IMPLICATIONS

a) Does the legislation have indirect or long-term financial impacts to the City of Seattle that are not reflected in the above?

Yes. This legislation will have impacts on costs associated with development of various Stormwater Code implementation tools (e.g., checklists and review forms, client assistance memos/Tips, submittal templates, etc.), as well as future project capital and operations and maintenance costs. Additional details on specific cost impacts are outlined below.

General. This legislation does not appropriate funds. It will impact costs and work requirements in several departments. The following department-specific notes are provided for illustrative purposes. Any budget or staffing adjustments will be addressed through the budget process by each individual department as needed.

Note 1. (SPU):

Cost implications for SPU include increases and decreases in capital project costs and associated O&M requirements for drainage control structures, and increases in O&M requirements for drainage control structures constructed in the street right-of-way.

1. *Future Capital (\$25,000)*

There will be a relatively small increase in SPU capital costs for some projects due to increased requirements related to site infiltration testing that will be included in the updated 2016 Stormwater Manual. SPU estimates \$25,000 in additional cost per year (\$5,000 per infiltration test pit x 5 projects/year).

There will be a relatively small increase in SPU capital costs associated with an increase in the number of smaller On-site Stormwater Management facilities, as there will no longer be a minimum facility size for permeable pavement or bioretention in the right-of-way (modifications 3.a described in Section 1 above). At this time, there isn't sufficient information to accurately project long-term costs; however, they are anticipated to be relatively small.

There will be a relatively small reduction in SPU capital costs associated with a decrease in flow control and water quality facilities resulting from new language to address unique construction limitations posed by public roadway work. At this time, there is not sufficient information to accurately project long-term cost decreases. However, they are anticipated to be relatively small.

2. *Future Operation and Maintenance (\$40,000 increase annually)*

SPU typically takes ownership and assumes operation and maintenance responsibility for subsurface drainage structures installed in the public right-of-way, including flow control and water quality facilities. SPU is therefore responsible for maintaining bioretention facilities installed in the right-of-way. Estimated cost impacts of this code update are provided below and include labor as well as costs associated with equipment, repair, replacement, disposal, and other life-cycle costs related to maintaining these facilities. For reference, it is anticipated that the greatest increase in SPU O&M costs related to stormwater management will result from increased redevelopment, not from updated requirements.

There will be an increase in SPU O&M costs due to an increase in the number of smaller on-site stormwater management facilities as there will no longer be a minimum facility size for permeable pavement in the right-of-way. SPU estimates it will cost an additional \$40,000 annually (\$5,000/year/small facility * 8 additional facilities).

There will be a slight decrease in SPU O&M costs due to a decrease in flow control and water quality facility installations, resulting from new language to address unique construction limitations posed by public roadway right-of-way work. At this time, there isn't sufficient information to accurately project long-term cost savings; however, they are anticipated to be relatively small.

Note 2. (SDOT):

1. *Future Capital (\$65,000 per year)*

SDOT capital project costs in creek basins will increase as a result of this legislation due to an increase in the number of smaller permeable pavement facilities as there will no longer be a minimum facility size for permeable pavement in the right-of-way. SDOT estimates an increase in the number of new permeable pavement

installations on capital projects of approximately 25,000 square feet each year. SDOT compared installation costs of permeable pavement versus standard pavement and found permeable pavements to be approximately 28 percent more expensive to install. Based on the number of capital projects constructed in 2013 and 2014 that would be required to apply On-Site Stormwater Management and could have installed permeable pavement, the fiscal impacts are estimated to be \$65,000 each year and increase each year consistent with construction inflation.

The relative durability of permeable pavement installations versus traditional sidewalks is unknown, though SDOT Pavement Engineering believes it to be less than the estimated 100-year life of traditional sidewalks. The \$65,000 represents only the incremental cost to construct permeable pavement versus a traditional sidewalk. It does not take into account full life cycle costs should the permeable pavement installation not achieve a 100-year useful life, requiring full reconstruction at year 50, for example. At this time there isn't sufficient information to accurately project long-term cost increases.

There will be a relatively small decrease in SDOT capital costs associated with a decrease in flow control and water quality facilities resulting from new language to address unique construction limitation posed by public roadway right-of-way work (modification 2.d described in Section 1). At this time, there isn't sufficient information to accurately project long-term cost decreases; however, they are anticipated to be relatively small.

2. *Future Maintenance (\$40,000+ increase annually)*

There is expected to be a significant increase in permeable sidewalk maintenance needs as a result of an increase in the number of SDOT and privately constructed street improvement projects as there will no longer be a minimum size requirement for permeable pavement facilities (modification 3.a described in Section 1 above) and because permeable pavement is in the top tier of On-site Stormwater Management options of the prescriptive list and must be considered for feasibility before other types of stormwater controls (modification 3.b described in Section 1 above).

The 2010 SDOT-SPU MOA Number GSI-1 assigned SDOT the responsibility for inspection and maintenance of permeable sidewalks. This existing agreement assumed SDOT would accept maintenance units of entire block faces of sidewalk. Because these stormwater code changes result in an increased number of smaller, geographically dispersed permeable pavement projects, the MOA will be re-negotiated, including roles and responsibilities, and may have fiscal impacts between departments.

Preventative maintenance for permeable pavement includes annual maintenance with a sidewalk size street sweeper. SDOT has an MOA with Parks for sweeping of permeable pavement sidewalks; Parks is currently performing this work at no cost to SDOT. Parks intends to re-negotiate that MOA which would result in the existing and future maintenance costs falling on SDOT under the existing 2010 SDOT-SPU MOA Number GSI-1 absent any renegotiation between SDOT and SPU.

There is not sufficient history to accurately project long-term costs associated with this preventative maintenance. When preventative maintenance is not adequate, corrective maintenance will be required, which is anticipated to be done with pressure washing. SDOT estimates the cost of mobilizing a crew and pressure washing a non-permeable sidewalk is \$1.62/square foot. To account for moss growth that occurs on permeable cement and the difficulty of removing the moss, the cost estimate for cleaning installations of permeable sidewalk is increased to \$3.20/square foot.

SDOT estimates, based on previous capital projects (2013 – 2014), a 25,000 square foot increase in permeable pavement sidewalk installations each year. Using that estimate, and conservatively assuming maintenance to occur with pressure washing, maintenance costs will increase from \$40,000 (the cost of cleaning non-permeable pavement) to \$80,000 each year (the cost of cleaning permeable pavement). This cost will increase annually as the estimated 25,000 square feet of new permeable pavement is installed each year.

SDOT has not collected enough data on past private project exemptions from installing permeable sidewalks (i.e., projects under 2,000 square feet of impervious surface under the current Stormwater Code) to accurately estimate future permeable pavement installations. However, based on a total of 221 Street Improvement Projects permitted by SDOT Street Use in 2014 and 2015 to date, approximately 5 percent install permeable pavement. Under this legislation the rate of permeable pavement installation is expected to increase from 5 percent up to 30 percent within affected creek basins. There is not sufficient history to accurately estimate long-term pavement maintenance requirements associated with these projected private project increases (including estimating replacement due to failure rates). However, the O&M costs are expected to escalate under the 2016 Stormwater Code.

Permeable roadways will only be required on low volume roadways including maintenance access roads, alleys and private roadways. There isn't sufficient history to accurately project long-term costs associated with maintenance of the public permeable pavement alleys.

3. *Database enhancements for asset tracking (\$20,000)*

The database SDOT uses to track assets and assign work orders will require modification to allow for tracking of permeable pavement sidewalks on a per-square foot basis. The enhancement to link a GIS field is needed in order to allow for GIS mapping of permeable pavement locations within that system. These enhancements are expected have a one-time cost of \$20,000 and ongoing incremental cost increases for data entry and maintenance tracking

Note 3. (Parks):

Cost implications for Parks include:

1. *Future Capital (\$2.2 million over 6 years)*

The Seattle Parks 2016-2020 Six Year Capital Plan and the Metropolitan Park District Major Maintenance Project list for 2016-2020 include a number of projects that will be affected by the 2016 Stormwater Code update. The project types are primarily athletic fields (including grass turf conversions to synthetic fields) and other Parks

projects such as comfort station renovations and play area renovations. The costs related to each project type are summarized below. Over the six year period, Parks estimates an increase of \$2.2 million in capital costs to comply with the new Stormwater Code.

- a. Athletic Fields – In accordance with Ecology requirements, the 2016 Stormwater Code will add “natural and artificial turf” as a pollution-generating pervious surface that will require stormwater facilities when thresholds are met (modification 1 described in Section 1).
 - i. Parks estimates compliance required stormwater facilities would add 10 percent on a total of \$9.8 million from 2016-2021 for athletic field conversions from grass to synthetic turf (\$1 million). The 2016 CIP does not include any conversion projects and Parks will work with CBO in 2017 to address funding shortfalls on conversions planned in 2017 and beyond.
 - ii. Replacements: For the remaining synthetic turf surfacing replacement projects, Parks estimates half of the total project costs for the surfacing replacement projects would increase due to the 2016 Stormwater Code Update. Fifty percent of the total estimated costs of \$12 million from 2016-2021 are expected to increase by an additional \$600,000 over the six year planning cycle. The 2016 CIP does not include any ball field replacement projects. Parks will work with CBO in 2017 to address funding shortfalls in 2017 and beyond.
- b. Remaining Parks projects:
 - i. Based on the MS4 Permit requirements, the 2016 Stormwater Code Update does not allow use of trees to mitigate 25 percent of the impervious area above using other Best Management Practices (BMPs). Additionally, cost can no longer be a reason for not using other BMPs. Because of these changes, Parks anticipates bioretention and permeable pavement will be used more often than is currently the case. For the remaining Parks projects, these increased costs would add and estimated \$550,000 between 2016-2021. For these projects, Parks will evaluate project scope as a first strategy to address the cost increases and will work with CBO on funding shortfalls that cannot be addressed by this approach.

2. *Future Operation and Maintenance. (TBD as part of 2017-2018 new facility maintenance cost estimates)*

Parks will incur additional costs for maintaining new water quality treatment facilities for ball fields and other BMPs described above. Parks will estimate these new facility maintenance costs as projects are completed and will submit a funding request in the 2017-2018 budget, which will include maintenance staff and possibly equipment.

b) Is there financial cost or other impacts of not implementing the legislation?

Yes. If adequate legislation is not adopted, the City risks non-compliance with its MS4 Permit, which is based on the federal Clean Water Act. Anyone who negligently violates the Clean Water Act is subject to criminal penalties of \$2,500 to \$25,000 per day or imprisonment of up to one year, or both. These penalties increase with second and subsequent violations of the Clean Water Act. Anyone who knowingly violates the Clean Water Act is subject to criminal penalties of \$5,000 to \$50,000 per day of violation, or imprisonment for up to three years, or both. Additionally, violating the City's MS4 Permit presents a risk of a third-party lawsuit to enforce the Clean Water Act.

- c) **Does this legislation affect any departments besides the originating department?**
 Yes. See Section 3 above. In addition, it is notable that this legislation applies city-wide, and includes minor revisions to minimum requirements related to source control, construction site stormwater pollution prevention, and development projects. The effect of this legislation on other departments will vary to the degree that each department engages in ongoing activities to which source control measures apply, or to the degree that each department is involved in capital projects.

- d) **Is a public hearing required for this legislation?**
 Yes. In preparing this legislation, SPU and other City staff held meetings and made presentations to a wide range of stakeholders. A summary listing is below.

Public Presentations on Overall Stormwater Code Update Process

Date	Group
January 24, 2013	Thornton Creek Alliance
March 18, 2013	External User Stakeholders
May 8, 2013	Master Builders Association of King and Snohomish Counties
May 9, 2013	Fauntleroy Watershed Council
June 27, 2013	Seattle Builders Council Master Builders Association
November 7, 2013	Public Open House
November 19, 2013	Thornton Creek Alliance
November 26, 2013	North Seattle Industrial Association
December 17, 2013	King County
June 3, 2014	Public Meeting
June 5, 2014	Seattle Builders Council Master Builders Association
June 11, 2014	American Council of Engineering Companies (ACEC)
July 15, 2014	Washington Society of Landscape Architects (WASLA)
July 16, 2014	Master Builders Association (MBA)
July 17, 2014	American Society of Civil Engineers (ASCE)
July 18, 2014	American Public Works Association (APWA)
August 13, 2014	Urban Forestry Commission
January 26, 2015	Puget Soundkeeper Alliance (PSA)
February 24, 2015	North Seattle Industrial Association
March 19, 2015	SPU Developer Services Advisory Committee
June 3, 2015	Urban Forestry Commission
June 10, 2015	Public Meeting

e) Is publication of notice with *The Daily Journal of Commerce* and/or *The Seattle Times* required for this legislation?

Yes. Publication of notice of the Council public hearing must be made in *The Daily Journal of Commerce* and in the City's Land Use Information Bulletin (LUIB). Additionally, environmental review under the State Environmental Policy Act is required, and publication of notice of the environmental determination was made in *The Daily Journal of Commerce*, *The Seattle Times*, and in the City's Land Use Information Bulletin on March, 9, 2015, when amendments to the Stormwater Code legislation were first proposed. An addendum to the environmental review covering the current proposed legislation has been issued and publication of notice of the addendum was made in *The Daily Journal of Commerce* and *The Seattle Times* on June 25, 2015.

f) Does this legislation affect a piece of property?

No. The proposal is a non-project legislative action with no specific site. As Stormwater Code requirements are city-wide, specific projects affected by the proposal may occur anywhere within Seattle's city limits.

g) Please describe any perceived implication for the principles of the Race and Social Justice Initiative. Does this legislation impact vulnerable or historically disadvantaged communities?

There is no perceived implication for the principles of the Race and Social Justice Initiative.

h) If this legislation includes a new initiative or a major programmatic expansion: What are the long-term and measurable goals of the program? Please describe how this legislation would help achieve the program's desired goals.

This legislation does not include a new initiative or a major programmatic expansion.

i) Other Issues:

List attachments below:

Exhibit A – Directors' Report

Exhibit B – April 2014 Draft Stormwater Manual (Draft Directors' Rule)

Exhibit C – Ecology comments on the Draft Stormwater Code and Draft Stormwater Manual (Draft Directors' Rule)