

Water Environment Services

Project Update

Sanitary and Stormwater Rules and Standards



Presentation Agenda

- Introduce Water Environment Services
- Provide an overview of rules and standards project
- Present key policies under review
- Identify next steps and opportunities for input

Water Environment Services

WES is your clean water provider

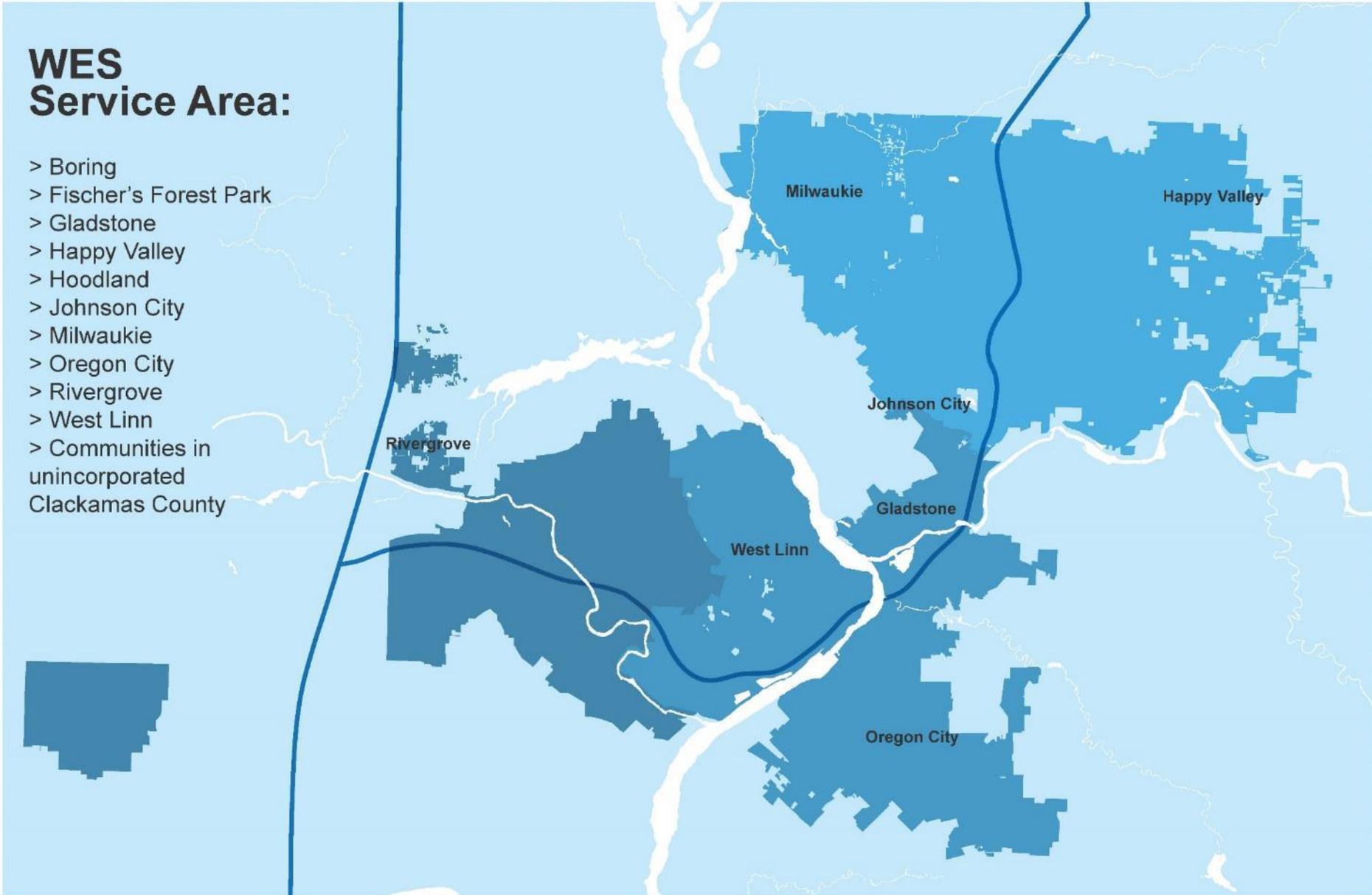
Our job is to...

- ✓ Protect public health and the environment
- ✓ Provide infrastructure to support economic development
- ✓ Educate the public on what they can do to help keep our watersheds healthy



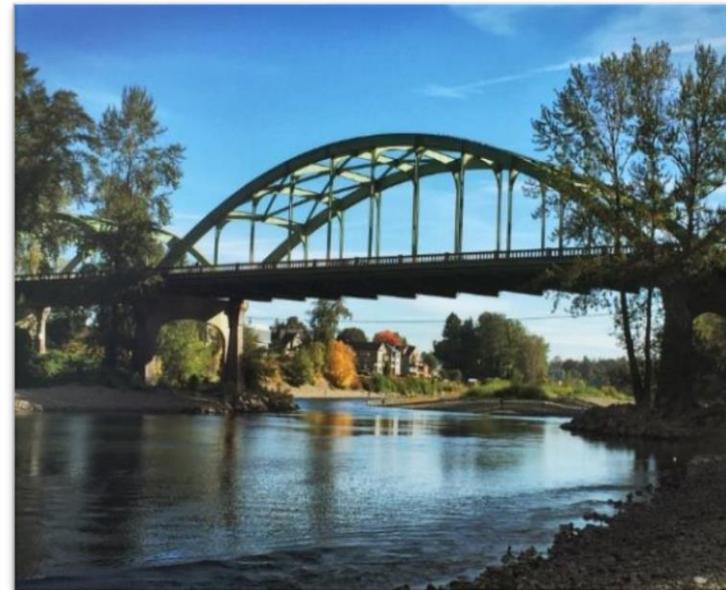
WES Service Area:

- > Boring
- > Fischer's Forest Park
- > Gladstone
- > Happy Valley
- > Hoodland
- > Johnson City
- > Milwaukie
- > Oregon City
- > Rivergrove
- > West Linn
- > Communities in unincorporated Clackamas County



Benefits of Regionalizing Sewer & Surface Water

- ✓ Regulatory alignment and efficiencies
- ✓ Predictability in rates and long-range capital planning
- ✓ Administrative efficiencies
- ✓ Regionalized operations
- ✓ System resiliency



Overview of WES Rules and Standards Project

Why Update the Rules and Standards

Develop uniform stormwater and sanitary rules and standards across WES service areas

- ✓ Provide for regional alignment
- ✓ Streamline development review and approval processes
- ✓ Address regulatory drivers and mandates
- ✓ Update fiscal and technical policies
- ✓ Reflect new technologies, approaches, and development patterns



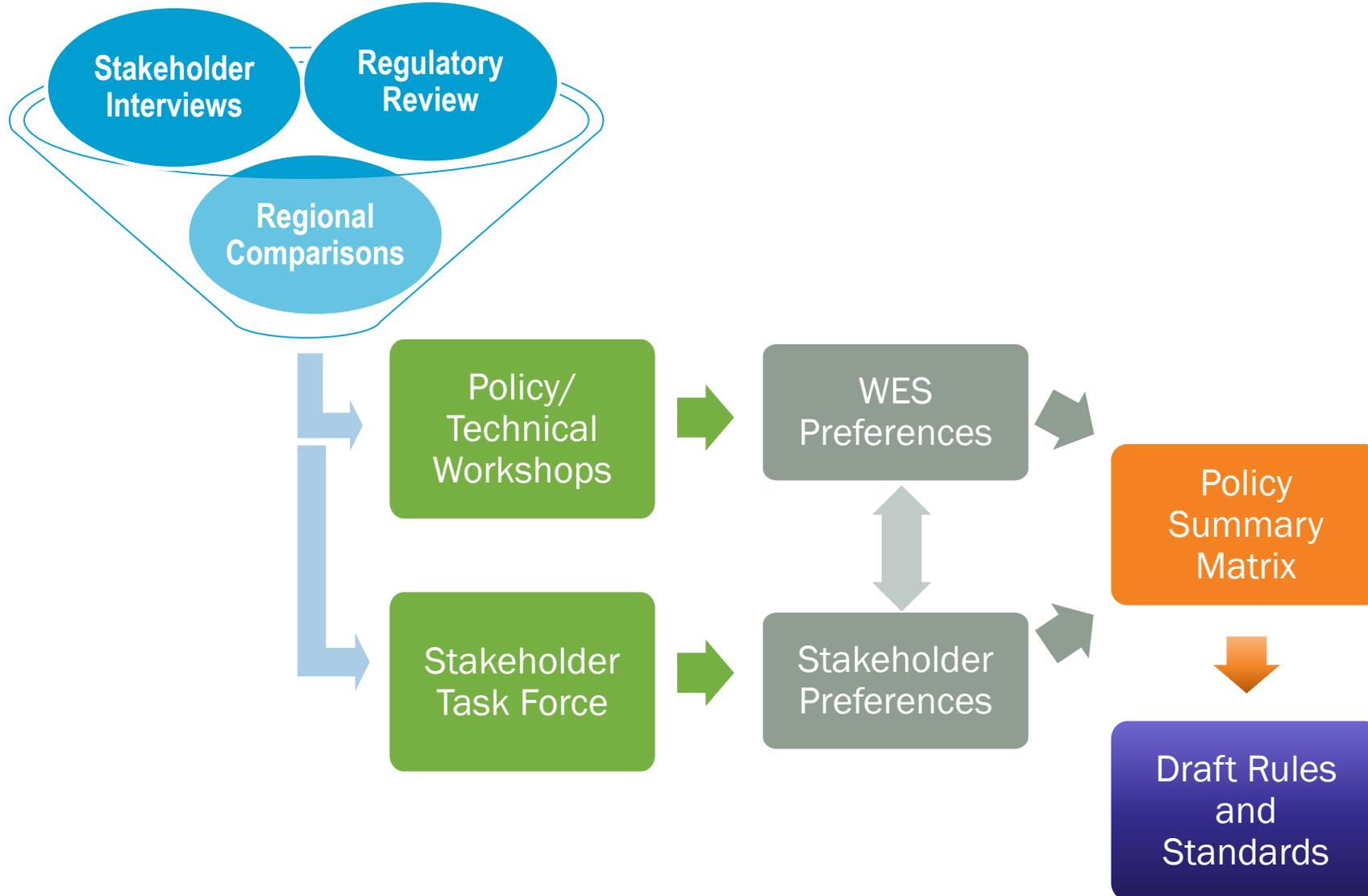
Project Goals and Objectives

Develop consistent, comprehensive sanitary and stormwater rules and standards for WES's service districts

Engage WES Staff and external stakeholders to identify and resolve key policy issues

Establish rules and standards that provide infrastructure to support economic development while protecting public health and environment

Policy Setting Process



Stakeholder Input

- What would improve the standards?
- What project types need modification to the standards?



What we heard from stakeholder input

Collected 50 recommendations for updates to the Rules and Standards to be included in the review process.

- ✓ Few concerns with sanitary standards
- ✓ Need to update fiscal policies related to development
- ✓ Lack of consistency within WES and also the need for a straight-forward review process
- ✓ WES's stormwater standards are challenging to implement on some development sites
- ✓ Need for stormwater design tools that match typical development and facility types.



Policy and Technical Issues



Key Policies to Review

Key Policies

Administrative Improvements

- Single set of rules for all WES service areas
- Streamline development review and approval processes

Stormwater Policies

- LID/GI prioritization
- Water quality standards/pollutant removal goals
- Flow control strategy
- Downstream analysis requirements

Sanitary Sewer Policies

- Sanitary Sewer Design
- Pretreatment Program
- Fats, Oils & Grease Requirements

Fiscal Policies

- EDU assignments
- Reimbursement Districts
- Low income discounts

Inspection and Enforcement

- Streamlined notifications and processes

Administrative Improvements

Issues

- Differing rules and standards within WES service area
- Rules and standards are challenging to implement and sometimes conflict with other development requirements

Potential Policy Changes

- Single set of rules for all WES service areas
- Move stormwater design up in the development review process to better align with city/county land use reviews

Fiscal Policies

Issues

- Equivalent Dwelling Unit assignments are inconsistent
- Limited opportunities for developer reimbursements
- Minimal participation in low income discount

Potential Policy Changes

- Non-residential EDU methodology improvements, e.g. warehouses and storage facilities
- Exploring residential EDU assignments based on dwelling size
- Seeking authority to establish sewer reimbursement districts
- Expanding low income discounts for monthly rates



Low Impact Development and Green Infrastructure

Issues

- NPDES permit requires stormwater approaches that prioritize LID and Green Infrastructure
- Current infiltration requirement leads to high rate of design variances
- Green Infrastructure has multiple environmental benefits

Potential Policy Changes

- Green Infrastructure encouraged where it is smart and feasible
- Design manual includes site planning strategies for low impact development
- Facility design allows infiltration as a flow control approach
- Design manual includes guidelines for green infrastructure facilities: rain gardens, stormwater planters, swales, pervious pavements, green roofs



Water Quality Standards and Pollutant Removal Goals

Issues

- Stormwater facility design must meet mandated performance standards
- NPDES permit requires stormwater standards that prioritize LID and GI
- Current standards have limited design guidance on allowable BMPs

Potential Policy Changes

- Provide a list of allowable water quality treatment BMPs
- Provide more specific design guidance for LID facilities, e.g. swales and rain gardens
- Emphasis site planning and treatment performance



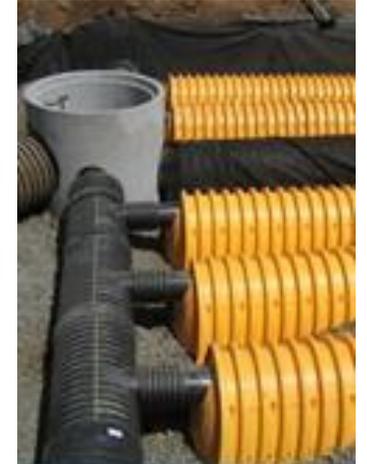
Stormwater Flow Control Strategy

Issues

- Current infiltration requirement leads to high rate of design variances on difficult sites
- Stream erosion still occurs if peak runoff is controlled, need volume control
- Water quality and stream health need improvement

Potential Policy Changes

- Infiltration encouraged where feasible, not required
- New performance criteria for flow control, focused on controlling rate and duration of runoff
- Specific requirements for redevelopment
- Allow flow control exemptions for direct discharge to Clackamas, Willamette and Tualatin Rivers



Sanitary Sewer Policy

Issues

- Regional consistency of design standards
- Modernize technical specifications and requirements
- Public pump station policy too strict

Potential Policy Changes

- Updated list of materials and material specs
- Updated line and grade inspection standards
- Minimum slopes based on pipe size
- Require TV Inspections prior to WES acceptance



Pretreatment Program

Issues

- Regional consistency of industrial waste limits
- Alignment with EPA requirements for industrial dischargers

Potential Policy Changes

- Updating industrial user categories for consistency with EPA Streamlining Rule
- Adding rules for grease trap maintenance and reporting



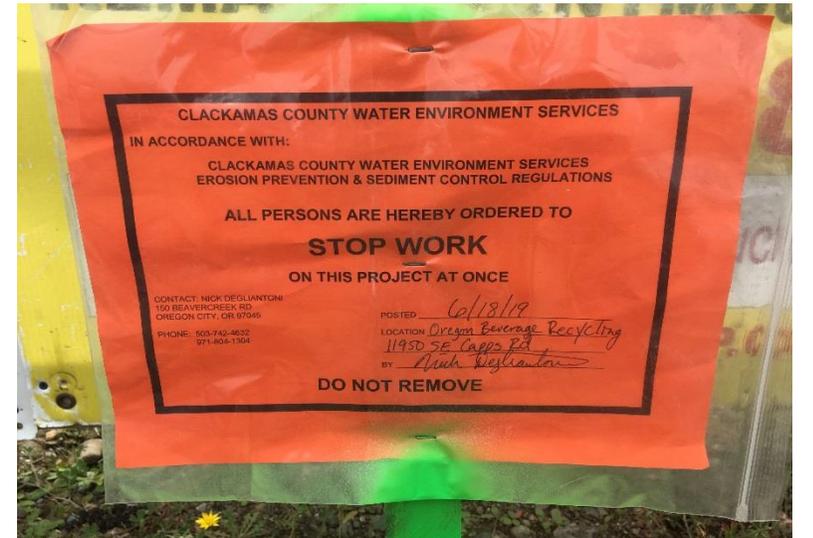
Inspection and Enforcement

Issues

- Current policy difficult to implement
- Clear interpretation and application

Potential Policy Changes

- Streamlined notification and processes
- Table of potential fees and penalties



Next Steps and Opportunities for Input

Stakeholder Forums

- December 5, 6:00-8:00, Clackamas CC, Harmony Campus
- December 10, 2:00-4:00, WES DSB

Public review of draft rules and standards

- Winter 2020
- Public comment period
- Available on WES website

Clackamas County Commission review and adoption

- Public hearings and testimony opportunity

Implementation Workshop

- Development and engineering community
- Following adoption

Thank you! Questions?



www.clackamas.us/wes