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**To:** Debbie Tarry <[dtarry@shorelinewa.gov](mailto:dtarry@shorelinewa.gov)>; Randy Witt <[rwitt@shorelinewa.gov](mailto:rwitt@shorelinewa.gov)>; Lance Newkirk <[lnewkirk@shorelinewa.gov](mailto:lnewkirk@shorelinewa.gov)>; Christine Lovelace <[clovelace@shorelinewa.gov](mailto:clovelace@shorelinewa.gov)>

**Subject:** Shoreline School District SWM Fee Education Credit Program 2021 Review

Hi Debbie (and All),

As promised, here are the draft notes from our discussion of the SWM Fee Education Credit Program 2021 Review the afternoon of Wednesday 7/21 earlier this week. Please feel free to add your notes to these notes to get a more complete picture of the meeting, in case there's something I missed:

Initial discussion included:

- Calculated increases to District SWM Fees – based on reviewing hard surfaces for District properties, which have not been updated for over 10 years. This review – if applied - would add approximately \$210k to the District's 2021 SWM Fees. (Note that 2020-21 school year coursework applies to 2021 SWM Fees for District.)
  - Support for idea that full parcels and portions of parcels owned by the District but used by City for Parks/Rec purposes could or should be excluded from District's SWM Fee billing, and rather be paid by Parks under the internal SWM Fee arrangement for Parks. This change – if applied - would reduce the District's 2021 SWM Fees by about \$65k.
  - The net change in the District's 2021 SWM Fees is roughly a \$145k increase if the hard surface review is combined with removing Parks-used sites from the District's SWM billing.
- Response to District request for SWM Fee Credit for new stormwater treatment facilities – which is not recommended by staff for facilities required by NPDES permit, but would be great for any new facilities providing treatment above and beyond NPDES requirements.
  - Side discussion: under next SW Master Plan consider SWM Fee restructuring with potential City-wide surcharge for older larger and/or highly impervious private properties with no on-site stormwater treatment

Ideas on future SWM FEC program changes:

- Consider a phased implementation of incremental program changes, such as
  - 2021-22 school year: no change
  - 2022-23: implement Option 2 (update curriculum to align more closely with Surface Water topics)
  - 2023-24: implement Option 3 (award credit based on relevant coursework, and deny credit for irrelevant coursework)

- For a date TBD (potentially as soon as 2021-22 or 2022-23) also consider adding the following SWM FEC options or requirements:
  - Option 4: SWM Fee Credit-related incentive (or penalty) to motivate District to complete NPDES required maintenance to avoid City getting a G20 Permit non-compliance due to District failure to maintain their facilities (as happened recently in 2021)
  - Option 5: All SWM Fee Credit for Stormwater Retrofits (as an alternative to curriculum-only credits, in case the District is challenged to provide enough relevant education credits for 100% of the SWM Fee)
- 2024-2025 and/or 2025-2026: Further SWM FEC program changes may be rolled out based on policy review, discussions, and recommendations to be done under the next SW Master Plan (scheduled for 2022-23 or -24) as part of the next SWM Rate study to set SWM Fees for the coming years. This effort could also be used to align future SWM FEC program reviews under future SW Master Plans – if the SWM FEC program is to continue – rather than doing SWM FEC program standalone reviews between SW Master Plans.

Next steps:

- John to write meeting notes
- John and Christie to create updated version of SWM FEC review memo for sharing review results and recommendations with District. Memo changes to include:
  - Remove policy discussions and any options we won't be pursuing or discussing at this time
  - **Revise recommendations section to align with proposed program changes outlined above (I don't recall if we specifically discussed this in Wednesday's meeting, but this was my understanding)**
  - Add info/section about 2021 G20 Permit non-compliance due to District's failure to maintain stormwater facilities
  - Move "Other Jurisdictions" section – remove from main body, include as attachment
  - Note that under "Option 3" future curriculum reviews would be "qualitative" to ensure proper alignment of submitted coursework with approved topics, in addition to "quantitative" review to verify number of hours and earned credit value. Only "quantitative" reviews have been done by the program to date.
- Draft memo to District to be reviewed by Debbie and potentially CC prior to sending to District
- Randy and John to share memo with District (Marla) once the memo is ready – tentative schedule would be to have memo ready for District within ~one month – by end of August

- Randy and John to meet with District (Marla) ideally around two weeks after sending the memo, to discuss the memo, District feedback, and path forward
- Coordination going forward after this point would be based upon the outcome of the meeting with Randy, John, and Marla, and will likely continue through the fall months of 2021 and possibly beyond.

Ok, those are my notes as I have them. Please edit or expand upon any of this as needed.

Thanks,

**John Featherstone, P.E. | Surface Water Utility Manager**

*He/him pronouns*

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