

**2018-2023 SBP Update  
Reduction Option Template**

<b>Cost Reduction:</b> Stormwater Regulatory Placeholder #10	<b>Owner:</b> Ben Marre
<b>Focus Area:</b> Protecting Environmental & Public Health	<b>Sponsor:</b> Madeline Goddard

**1. Short summary of the cost reduction (suitable for using with Customer Review Panel and other members of the public, plus additional specifics required for clarity of action).**

This reduction option eliminates \$4.8 million in planning, design, and construction for additional stormwater retrofit projects that may be needed to meet updated regulations for stormwater infrastructure. Past and current examples of retrofit projects include Capitol Hill Water Quality Project, the South Park Water Quality Project, and Natural Drainage System Partnering.

The City of Seattle's National Pollutant Discharge Elimination System (NPDES) stormwater permit requires the City to have a structural stormwater program. The stormwater permit will be reissued to be effective August 2018 and expire July 2023. The Department of Ecology has indicated that the reissued permit will have additional requirements to provide structural stormwater control retrofit projects (flow control, water quality) during the permit term. At this time, it is not known whether currently planned retrofit projects will be sufficient to meet the additional requirement. This baseline budget item provides planning, design, and implementation of additional stormwater flow control and/or water quality retrofit projects that may be required during the 2018-2023 stormwater permit. It also begins planning for flow and/or water quality retrofit projects anticipated to be required in the 2023-2028 stormwater permit.

**2. What are the impacts or risks of this cost reduction? How will you mitigate these risks?**

This reduction will make it difficult for SPU to plan, design, and construct stormwater control projects that may be required by future regulations. Specific risks include:

- Potential inability to meet future regulatory requirements for stormwater retrofits;
- Potential for the City to be out of compliance with the reissued Stormwater Permit; and
- Potential fines and/or water quality order for non-compliance.

To mitigate these risks SPU would:

- Try to influence future permit requirements to ensure that currently planned retrofit projects are sufficient to meet updated permit requirements.
- Reestablish the budget once the stormwater permit is reissued and the specific regulatory requirements are known.

**3. Implementation plan and timeline.**

The cost reduction could affect City compliance to the stormwater permit from 2018 to 2023.

**4. Budget and FTE changes****Changes (relative to baseline)**

	2018	2019	2020	2021	2022	2023
O&M (Non- Labor) Budget Change						
CIP Budget Change				(500,000)	(800,000)	(3,500,000)
FTE Change						

**5. Identify possible race and social justice implications for this reduction. How will it impact service equity and how will you resolve this impact?**

There are no known race and social justice implications for this reduction at this time.

**6. Describe your plan for evaluating the impacts of this reduction. Include any metrics you have.**

The draft stormwater permit will be issued at the end of 2017. At that time, SPU can evaluate whether currently planned retrofits are anticipated to meet the updated stormwater retrofit requirement and determine any additional costs for planning, designing, and implementing new projects. The currently proposed funding and associated timing to meet the regulatory requirement would need to be reinstated to remain in compliance with the stormwater permit.

Noncompliance with the stormwater permit would include fines while still requiring the City to meet the regulatory requirement.