

# General Principles Guiding Decisions on Urban BMP Interpretation Requests

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# Some Recent Requests

- Retrofit of facility not originally designed for stormwater quality treatment, such as a farm pond, a PL-566 reservoir or a flood control facility.
- New retrofit built before 2006
- “Smart BMP” Retrofits
- Combo retrofit and stream restoration
- “Self-converting” wetlands

# Discussion

- What are the ground rules for deciding these BMP Interpretation requests, short of launching a full blown BMP expert panel?
- Need a consistent process for assessing and accepting them, as well as letting states and MS4s know about the new options.

# Suggested Rationale

- Not be a proprietary practices (separate review process being considered)
- Can “map” into an existing urban BMP definition and protocol
- Example: Smart BMP is classified as an existing category of retrofit (BMP enhancement) and removal rate calculated by an existing ST adjustor curve protocol.
- May also be expressed as an incremental increase above the BMP baseline, but must have research documentation (e.g., PEDs/FTW).

# Rationale (continued)

- Represents a real change on the ground that occurs in the present day (e.g., no historic BMP finds)
- Have verification procedures that are as stringent or more stringent than their “parent” BMP
- Need to be consistent with CBP tools (CBWM and Scenario Builder) and acceptable to modelers

# Suggested Process

- Proposer provides supporting documentation for consideration by USWG
- USWG can accept, accept w/ modification, reject or require a full blown expert panel
- States can individually opt out if they are not comfortable with the reporting requirements
- May require coordination with WTWG on Scenario Builder issues

# Next Steps

- Initial Discussion Today
- Comments on Draft BMP Interpretation Policy @ next USWG meeting
- Apply the policy to the “Smart BMP request” and subsequent requests