

Stillaguamish River Clean Water District Advisory Board

BOARD MEMBERS

*Single Family Ratepayer –
Stillaguamish Drainage Basin*
Dale Shelton (Chair)

*Single Family Ratepayer –
Skagit Drainage Basin*
Graham Logen

*Single Family Ratepayer –
Port Susan Drainages*
Vacant

Single Family Ratepayer - Lakes
Miriam Lancaster

*Single Family Ratepayer –
Tulalip Drainage Basin*
Vacant

Ratepayer – At-Large #1
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Ratepayer – At-Large #2
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Ratepayer – At-Large #3
Bob Landles (Vice Chair)

Ratepayer – At-Large #4
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Farm Rate Payer
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*Diking, Drainage, and Flood Control
Districts*
Vacant

Snohomish Conservation District
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Snohomish Health District
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Ecology*
Colleen Crotty

*Washington Department of Fish
and Wildlife*
Vacant by agency choice

Stillaguamish Tribe
Vacant by agency choice

Tulalip Tribes
Vacant by agency choice

Surface Water Management Staff
Sean Edwards

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February 23, 2017

Will Hall, Director
Snohomish County Surface Water Management
3000 Rockefeller Ave., MS 607
Everett, WA 98201

Dear Mr. Hall,

The Clean Water District Advisory Board wishes to respond to your request for comments on the proposed 2017 budget cuts as apportioned in the attached Surface Water Management (SWM) spreadsheet. The need for these cuts stems from the refusal of the US Navy to pay its Clean Water District (CWD) fees over the past five years. This revenue shortfall was not properly accounted for in the CWD budgets during that period, resulting in a cumulative funding deficit of roughly \$418,000. We understand that this deficit will be lessened substantially by the 2016 end-of-year budget remainders.

Our comments and recommendations on budget cuts are as follows:

- Advisory Board staffing (WO537) – The proposed 50% cut would require a proportionate reduction in the annual number of meetings, which was rejected at our January 2017 meeting. Given such a cut, the Board does not believe it can fulfill its responsibilities pursuant to T25A.30.030, and **recommends maintaining the current funding level.** It is also unclear how shifting personnel away from Board staffing would actually save money.
- Lakewise (WO480) – The proposed cut virtually eliminates the Lakewise program in the CWD. Because this program is a prominent part of our clean water and shellfish protection effort, is crucial to the maintenance of public health and recreation, and has moreover been highly successful, the Board views this cut as foolish economy. **We strongly recommend that this cut be scaled back substantially, enough for the program to continue.** Our Dept. of Ecology representative informs us that DOE provides free toxic algae lab testing during the summer. The Board urges SWM Lakewise staff to inquire into its use.
- Admin/OH (Various Programs) – Admin/OH (pensions, health care, and vacations) totaling \$929,079 for 2017, now takes 37 cents of every dollar of CWD fees. Since 2015, the Admin/OH cost charged to the CWD has risen by 24%, and within several programs, has grown to the largest single project cost. Within Program 120, for example, Admin/OH now makes up 83% of its entire budget—completely disproportionate to any program benefit.

SNOHOMISH COUNTY COUNCIL
RECEIVED CM TIME 12:10

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| JRM _____ | DIST 1 _____ | SRC _____ |
| JDG _____ | DIST 2 _____ | DLE _____ |
| YSW _____ | DIST 3 _____ | RNR _____ |
| CJT _____ | DIST 4 _____ | ELL _____ |
| GOT _____ | DIST 5 _____ | CMF _____ |

The Board has been told that Admin/OH costs are assigned to the CWD and the two WMAs proportionate to their respective revenues. By that method, the Navy's default should have lowered the CWD share of Admin/OH costs to about 14 percent. Instead, it remained at over 15 percent, making it evident that the CWD has overpaid its Admin/OH share, based, as was everything else in those budgets, on presumed collections from the Navy. **The Board recommends that SWM recalculate the CWD Admin/OH cost share based on the actual collections, over the 5-year period, and use the savings to cover much of the CWD deficit.**

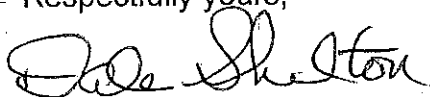
- Sustainable Land Strategy (WO256) - The Board is not aware of any significant CWD water quality, shellfish protection, or NPDES benefit that has resulted from the large sums spent on SLS. In keeping with the Board's long-held preference for on-the-ground projects of direct benefit, we recommend this project as a suitable candidate for reduction in expenditure.

Furthermore, the Board would take this opportunity to again **recommend that you lift your suspension of the Discretionary Fund program**, and return us to compliance with T25A.20.020(3)(b), mandated by the Snohomish County Council. We are now informed by SWM that the funds dedicated to this program are available after all, leaving no justification for continued DF suspension.

The Board strongly urges you to reverse your rejection of the Discretionary Fund project on Dale Shelton's property. The claim of conflict of interest is unjustified, since the Stillaguamish River Clean Water District Advisory Board By-Laws sets down the process and procedures whereby Board members may receive "funding that directly benefit their organization, themselves, their friends and family." These were clearly followed by the DF committee, as Ms. Shelton did not participate in the DF Committee rating process and recused herself from voting on this matter during the CWDAB meeting. Declaring Ms. Shelton ineligible not only ignores this provision, but unfairly discriminates against all citizens who volunteer for the County's various Boards and Commissions, by denying them services available to every other ratepayer and organization. The project indisputably qualifies under the DF Guidelines. It was unanimously recommended by the Board (with Dale recusing herself), and by Department of Ecology staff.

The Board thanks you for the opportunity to comment, in accordance with its duty to advise on "funding levels and priorities".

Respectfully yours,



Dale Shelton, Chair



Robert Landles, Vice Chair

Cc: Brian Sullivan, Snohomish County Council Chair
Gregg Farris, SWM Planning Manager
Steve Thomsen, Snohomish County Public Works Director

Proposed Changes to 2017 Budget for Stillaguamish CWD

| SWM Program | SWM Project # | SWM Project Name | 2017 Total Budget | 2017 CWD Revenues | Proposed Reduction | Details of Proposed Reduction | Potential Impacts |
|-------------|---------------|---|-------------------|-------------------|--------------------|---|--|
| 112 | WO537 | CWD Advisory Board | \$ 31,757 | \$ 31,757 | \$ 15,757 | Reduce SWM staff support for coordinating the CWD Advisory Board meetings and subcommittee meetings by roughly half of current levels. | <ul style="list-style-type: none"> The Board could hold fewer meetings in 2017, or hold some meetings without SWM staff support. The Board could develop and distribute meeting agendas and minutes instead of SWM staff. Vacant Board positions could take longer to fill. |
| 112 | WO561 | Shellfish Protection Program | \$ 145,421 | \$ 145,421 | \$ 20,000 | Reduce professional services support and communications support for this project. | <ul style="list-style-type: none"> Would likely reduce the amount of education/outreach performed. Would reduce consultant support for different tasks. |
| 113 | WC362 | Native Plant Riparian Restoration - Countywide | \$ 112,189 | \$ 14,367 | \$ 7,000 | With the exception of the Lakewise grant and other recent grant projects, native plant services within the Stillaguamish CWD would be suspended in 2017 while services within the South County and Snohomish WMAs would continue. | <ul style="list-style-type: none"> SWM would not begin any new planting projects within the CWD in 2017. SWM would limit its noxious weed control within the CWD in 2017 to grant related work. |
| 114 | WO489 | Lake Volunteer Monitoring | \$ 100,381 | \$ 33,460 | \$ 28,100 | The volunteer monitoring effort at CWD lakes would continue in 2017 but with a reduced number of parameters. Specifically, CWD lake volunteers would not take water samples but we take in-situ data (temperature, water clarity, etc.) | <ul style="list-style-type: none"> This cut will result in a missing year of data from a long time series of lake data (10+ years), but this is not an insurmountable problem. |
| 114 | WO480 | Lakewise | \$ 175,301 | \$ 41,767 | \$ 39,470 | The Lakewise program would temporarily shift to the Snohomish WMA. For the Stillaguamish CWD, the program would be limited to providing technical support to those already involved in the program. | <ul style="list-style-type: none"> No new properties within the CWD would be able to be added to the Lakewise program in 2017. |
| 116 | WM614 | Residential Facilities-- Inspection & Maintenance Non-NPDES | \$ 108,872 | \$ 8,531 | \$ 8,531 | Inspections of non-NPDES drainage facilities within the Stillaguamish CWD would be suspended in 2017 while services within the South County and Snohomish WMAs would continue as planned. | <ul style="list-style-type: none"> Non-NPDES facilities within the CWD would not be inspected and maintained in 2017, which could increase the risk of local flooding. |
| 118 | WC7417 | Small Drainage Capital (DRI) Prelim designs | \$ 40,647 | \$ 6,334 | \$ 6,334 | Continue the program as is, but use Road Fund revenues to replace CWD revenues in order to keep the program going in the CWD. | This subsidy may not be sustainable past 2017. |
| 118 | new project | Failing/Aging Infrastructure Analysis | \$ 86,741 | \$ 13,518 | \$ 13,518 | Continue the program as is, but use Road Fund revenues to replace CWD revenues in order to keep the program going in the CWD. | This subsidy may not be sustainable past 2017. |
| 118 | WC3034 | Fish Passage Culvert Prioritization & Implementation | \$ 114,868 | \$ 17,901 | \$ 17,901 | Continue the program as is, but use Road Fund revenues to replace CWD revenues in order to keep the program going in the CWD. | This subsidy may not be sustainable past 2017. |

Total = \$ 313,057 \$ 156,612

Projects/Programs That are Not Recommended for Changes to the 2017 Budget

- Discretionary Fund and Conservation District projects where revenues are dedicated by County code for specific purposes
- Lakes programs where money collected from residents is dedicated to specific uses
- Any projects that are necessary to fulfill the requirements of the County's NPDES permit
- Countywide SWM programs that are funded proportionately by WMA revenue and are challenging to isolate and restrict services only in the CWD
- Most floodplain non-capital projects are already subsidized by RPPT revenues in the 2017 budget
- Many drainage projects are already subsidized by Road Fund revenues in the 2017 budget
- Administration projects that support the operations of the entire SWM division
- ILA with Snohomish Health District