

City of Bainbridge Island

Attached are comments relating to the "Long-term Municipal Stormwater Planning" section of the 2019 permit. Thanks for considering.

Proposed Permit Language	Concerns / Justification improve language	Proposal / Proposed Language
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Watershed Planning		
<p><i>Objective</i></p> <p>The proposed initiation of a long-term MS4 planning requirement will help permittees make informed decisions about how and when to address existing and anticipated flow and water quality problems by:</p> <ol style="list-style-type: none"> 1. Developing an inventory of basins all or partially inside your jurisdictional boundaries, 2. Using existing information to complete a prioritization of your basins, and assessing data gaps, 3. Identifying catchment areas for planning within priority basins, and 4. Identifying specific approaches to apply within the catchment areas. 	<p>For this permit cycle allow the use of existing data to fulfill the permit requirements. Do not require new data gathering for Phase IIs.</p> <p>Requiring specific approaches on a catchment level will potentially require the collection of new data. Completing Objectives 1-3, as well as, additional proposed new requirements (local source control) would be enough of a challenge for Phase II permittees. Adding objective 4 might produce an unreasonable level of effort for all permittees.</p>	<p>4. Identifying specific approaches to apply within the catchment areas.</p> <p>Remove this requirement for Phase II permittees.</p>
<p><i>Approach</i></p> <ul style="list-style-type: none"> • use local information related to receiving waters and contributing area conditions to prioritize basins (1-10 sq m) • Id catchment (400-600 acres) • strategies or actions to protect and improve water quality for highest priority • Plan for each catchment (MS4 and complementary strategies???) <ul style="list-style-type: none"> ○ capital projects including regional facilities; ○ land acquisition and/or conservation easements; ○ land use or zoning code adjustments; ○ new critical area designations; ○ protected, enhanced, or restored riparian buffers; ○ enhanced MS4 maintenance; 	<p>I like the idea of the permit helping to force the conversation about watershed scale planning. Yet I would like to see the requirements end up flexible enough that small jurisdictions could still comply without having to produce an in-depth plan and get too specific with action items. It seems like this requirement has the potential to help jurisdictions think about stormwater on a watershed scale and could start to inform some decisions about stormwater retrofit projects but should not require additional analysis without ample grant opportunities. Currently our capital stormwater construction budget can barely fund failing cross culverts. We are focused on preservation due to our large area (27 sqmi) and high number of small drainages compared to our size of government. Watershed planning could help focus grant writing efforts but may not have much of an effect on</p>	

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<ul style="list-style-type: none"> ○ education and outreach. 	<p>retrofits or lead to implementation for a stormwater control transfer program.</p>	
<ul style="list-style-type: none"> ○ 6. Deliverable in year TBD of permit: proposed plan (including rationale for selected BMPs/actions) and estimated budget/funding approach. 	<p>How many Catchment Areas are required to have a plan? Also timing is important. when will 'TBD' (dates and numbers) be determined?</p>	