

## City of Renton

The City of Renton appreciates the opportunity to provide comments on the preliminary proposal on long term MS4 planning for the 2019 Western Washington Phase II Municipal Stormwater Permit. Please find our comments attached.

2019 Preliminary Draft Western Washington Phase II Municipal Stormwater Permit  
City of Renton Comments

Page	Comment	Recommendation
	Permit language is not provided with proposal, so will only allow for one review during the formal draft comment period. Ecology should consider releasing the permit language in Spring for informal comment prior to the formal comment period to include input from stakeholders.	Release a preliminary draft of the watershed planning program for informal comment in Spring.
2	Ecology refers to guidance that are not included in the Permit (e.g. "Building Cities in the Rain"). If Ecology expects Permittees to use these references, it should include them as an appendix in the Permit, so the requirements are fixed and known instead of evolving.	Include all references in the permit or its appendices.
3-4	Define "basin", "watershed area", "total watershed area", and "catchment". It is unclear what the size of "total watershed area" is, so difficult to determine if the basin is at least 10% of the total watershed area. Is the "total watershed area" the size of the WRIA, multiple basins greater than 1-10 square miles, or something else?	In the Permit, clearly define watershed terms and associated sizes.
4	Ecology proposes conducting a qualitative or quantitative assessment of receiving waters, but doesn't provide guidance on what to include in the assessment.	Provide guidance for qualitative or quantitative assessments.
4	The number of priority basins and catchment areas for planning are "to be determined".	Consider a maximum of 3 catchment areas as this is a reasonable number for implementing watershed plans.
4	The proposed plan infers the Permittee will conduct monitoring to assess water quality data. However, Permittees are already paying for monitoring through the monitoring requirement.	Do not require monitoring in addition to S8 requirements.
5	The proposed plan must be adaptively managed to be effective, so there needs to be flexibility built-in to amend the planned actions.	Provide for adaptive management by allowing for amendments to the plan.
5	An effectiveness assessment is proposed to provide feedback on implementation efforts. Ecology should provide guidance for what to include in the assessment.	Provide guidance for the effectiveness assessment.
4-5	Dates for deliverables are "to be determined". Ecology should consider that many Phase II jurisdictions do not have watershed planning staff, so must to obtain funding and hire new staff or a consultant which will take some time.	Consider at least 3 years to conduct qualitative or quantitative assessments so Permittees can obtain resources and develop an inventory.