

**Phase I, WW Phase II, and EWA PH II Formal Draft Comments (City of Redmond)**

Name	Document	Section	Page	Comment
Redmond	WW Phase II	S5.C.1.a.i(b)	18 of 92	Clarify which other long-range land use plans are to be reviewed/considered for this report.
Redmond	WW Phase II	S5.C.1.a.i(b)	18 of 92	The City's significant Comprehensive Plan update will be completed in mid 2023. A reporting deadline of March 2022 will not capture this major effort. Please delay this reporting deadline for applicable permittees.
Redmond	WW Phase II	S5.C.1.b.ii	18 of 92	Please revise second sentence of para 1 to clarify that "NEW Permittees shall conduct a similar review and revision process..." [This simply emphasizes which permittees must (or not) conduct the analysis
Redmond	WW Phase II	S5.C.1.c.i and ii(a)	19 of 92	It is unclear how these two assessments differ. Both seem to consider the receiving water condition and the extent to which stormwater influences it. We recommend that the first assessment only look at WQ data and only bring in stormwater considerations during the second step. To do this, please delete "to identify receiving waters that will benefit from stormwater management planning." Associated edits may be helpful in the guidance.
Redmond	WW Phase II	S5.C.1.c.ii(b) and c.iii	20 of 92	The S&T 2015 Fact Sheet (SAM_FS #009, Aug 2018) indicates that low watershed and riparian canopy cover is a significant stressor to BIBI. This was also identified in the various Phase I basin plans. Please add this as an allowable SMAP strategy.
Redmond	WW Phase II	S5.C.2.a.ii(b)	23 of 92	The behavior change campaign our City enacted in 2013-18 permit cycle was designed to encourage target audience to discontinue a specific behavior. The campaign was successful (and therefore the campaign is no longer "ongoing"). How can we reflect this in the evaluation called for in S5.C.2.a.ii(b)?
Redmond	WW Phase II	S5.C.2.a.ii(b)	23 of 92	Please consider changing the phrase "ongoing behavior change program" to "behavior change CAMPAIGN implemented in the 2013-18 permit cycle." Due to its success, our previous behavior change campaign has been discontinued. We do not feel it is appropriate to be 'penalized' for failing to continue to implement that program.
Redmond	WW Phase II	S5.C.5.a	28 of 92	Please change "Illicit connections and illicit discharges must be identified..." to "illicit connections and illicit discharges <b>MAY</b> be identified." This change allows for maximum flexibility in the ways in which we identify illicit discharges
Redmond		S5.C.5.c.ii	29 of 92	Discharges from fire sprinkler systems should not be included in list of conditionally allowed discharges as they may contain high levels of turbidity or iron, corrosion inhibitors, etc. Please note that these discharges are not allowed (e.g., under first bullet).
Redmond		S5.C.5.c.ii	29 of 92	Add another "conditionally allowed" bullet that is specific to pressure washwater. Pressure washwater may come from sidewalks, roads, driveways, parking lots, buildings. Perhaps it should be conditionally allowed if no soaps or other chemicals are used, no hot water, and sediment is physically prevented from reaching storm drain
Redmond	WW Phase II	S5.C.7.a.ii	38 of 92	Edit first sentence to read "Unless there are circumstances..., when an inspection identifies an exceedance of the maintenance standard, maintenance RELATED TO FACILITY FUNCTION shall be performed..." This edit allows Permittees to prioritize critical maintenance within the 6/12 month time period.

Redmond	WW Phase II	S5.C.7.a.ii or d.	49 of 92	Consider adding a performance measure (95%) for achieving maintenance within required timeframes. This edit aligns with the associated inspection performance measure. In a city with 11,000+ catch basins (for example), it does not seem like an important use of our time (or Ecology's) to prepare a G20 notification if one CB is not cleaned within the 6-month timeframe.
Redmond	WW Phase II	S5.C.7.e	49 of 92	Does Ecology have specific guidance/expectations re: how or where the practices, procedures are documented? Please clarify. Also, no timeframe is given for preparing the documentation. Documentation was not required in the previous permit cycle so please allow some time for us to pull all the documentation together and document any unwritten practices.
Redmond	WW Phase II	S5.C.8.a	51 of 92	Revise statement to read: "Each Permittee shall implement a program to prevent and reduce pollutants in runoff from areas WITHIN THEIR JURISDICTION that discharge to MS4s." We only have authority to addresses sources located within our jurisdiction's boundaries. This edit will clarify who has responsibility for activities on parcels located within one jurisdiction but that drain to a different jurisdiction's MS4. Please note that this edit may not work in the Phase I permit if language at S1.F stands. We believe there are no conflicts in the Phase II permit. Alternatively, change the opening statement to read "Each Permittee shall implement a program to prevent and reduce pollutants in the runoff from areas that discharge to MS4s OWNED OR OPERATED BY THE PERMITTEE."
Redmond	WW Phase II	S5.C.8.a	51-53 of 92	Language in several subsections refers to either "businesses and/or properties" OR "sites." If these terms are equivalent, only pick one. It is unclear if "site" is different from "business and/or property."
Redmond	WW Phase II	S5.C.8.a.iv	51 of 92	How is this permit requirement to be implemented? Does it apply to the same businesses and/or properties, above, or to other sources/parts of the City? How is this different from behavior change outreach described in S5.C.2.a.ii?
Redmond	WW Phase II	S9.A	73 of 92	please consider skipping the annual report covering 2019. At a minimum, the questions related to IDDE incidents should be skipped in the first year since the new reporting requirements (and data) do not become effective until August.
Redmond	WW Phase II	Definitions	90 of 92	add definition "stormwater facility regulated by the Permittee" to match Ph I permit
Redmond	WW Phase II	Appendix 1	4 of 47	Revise definition of PGHS. Current definition refers only to PGIS surfaces, omits permeable pavement (and green roofs). Include ALL hard surfaces in the definition.
Redmond	WW Phase II	Annual Report		Add due date to Q4a.
Redmond	WW Phase II	Annual Report		Q5: This question is, in some ways, covered in Q4a. Delete.
Redmond	WW Phase II	Annual Report		Q10: This Q can be eliminated. Just ask for the attachment in 10a.
Redmond	WW Phase II	Annual Report		Q11: This Q can be eliminated. Revise to 11a as "Attach Stormwater Management Action Plan developed for at least one high priority area."
Redmond	WW Phase II	Annual Report		Q54 can be deleted. The following Q (55) answers this question.
Redmond	WW Phase II	Annual Report		Q58 can be deleted. Qs 58a-c answer the same Q in greater detail.
Redmond	WW Phase II	Annual Report		Q59 should be revised to say "Attach documentation of alternative catch basin INSPECTION approach, if used"
Redmond	WW Phase II	Annual Report		Q67 can be deleted. It is answered in detail by Q68.
Redmond	WW Phase II	Appendix 12, Q6	1 of 38	Q6 asks for the "date of end of your response." What is meant by "end of response"? Does referral to another agency count? Do we need to wait until an illicit connection is actually corrected? Please clarify what is expected.

Redmond	WW Phase II	Appendix 12, Q7		seems to ask for a quantity two times. Revise Q?
Redmond	WW Phase II	Appendix 12, Q8		revise to "Business/FIRE inspection"
Redmond	WW Phase II	Appendix 12, Q8		revise "MS4 inspection/SCREENING"
Redmond	WW Phase II	Appendix 12, Q11		call out "turbid runoff" as a separate category (vs. sediment)
Redmond	WW Phase II	App 12, Q12		add UBI as a queryable code under "mobile business"
Redmond	WW Phase II	App 12, Q12		add in sprinkler water to correct category (prohibited? Conditionally allowable?)
Redmond	Phase I	S5.C.7	31 of 90	We support recommendations from Seattle/King Co re: advancing discussions focused on ways to improve and make most effective (from an environmental restoration and cost standpoint) the structural source control program. Topics to explore include establishing relative value (points) of different project types, consideration/acknowledgment of certain types of retrofits initiated outside of the permit cycle (e.g., large regional facilities). We are interested in participating in such a discussion.
Redmond	Phase I	S5.C.7.d and Appendix 12	31 of 90	Redmond is concerned about the removal of "capital projects related to the MS4 which implement an Ecology approved basin or watershed plan" as an eligible category of actions/improvements. We have an approved watershed plan and are investing heavily in its implementation. If projects associated with those plans are not eligible for consideration under this permit requirement, they may be 'deprioritized' for CIP implementation.
Redmond	Phase I	S5.C.7.d and Appendix 12	31 of 90	Please explain why maintenance level points are only available to projects that remove impervious surfaces (Project Type 10). Not allowing for additional "maintenance" points for retrofits (e.g., regional facilities) undertaken before the permit requirement becomes effective (e.g., previous 5-year cycle) may cause Phase IIs looking at this as an upcoming permit requirement to delay such projects (or minimize ongoing investments).