

# City of Renton

The City of Renton appreciates the opportunity to comment on the preliminary draft of the Western Washington Phase II Municipal Stormwater Permit for Stormwater Controls for Priority Developed Areas.

## Preliminary Draft Comments on Stormwater Control for Priority Developed Areas

Consider adding a provision to bank equivalent acres for projects that exceed the proposed level of effort and provide credits in subsequent permit cycles. This provision will incentivize larger scale, cost-efficient projects which will benefit receiving waters at a faster rate than smaller projects in every permit cycle.

We support the approach to use strategic investments by leveraging SMAP and opportunistic projects which allows for implementation of projects throughout the jurisdiction's geographic area. Consider a multiplier of 1.25 for implementing projects in the SMAP basin to incentivize stormwater controls in the priority drainage catchment.

In addition to population, scale the level of effort using assessed property values as a weighed factor. Population alone doesn't account for the financial resources of a jurisdiction to implement the permit requirement.

Consider providing an additional 25% credit for providing enhanced treatment for projects where only basic treatment is required.

Define fully funded. Consider funding for design, but not funding for construction as "fully funded". Starting from the effective permit date, it may take up to two years to add projects to a jurisdiction's adopted budget and work plan. Given Ecology's funding cycle, it may take the remaining term of the permit to secure planning and design funding and start design. Consider changing the "fully funded" date to the anticipated expiration date of the permit (July 31, 2029), especially since Ecology funding is not effective until July 1.