

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

February 23, 2010

Mr. Steve Hitch Senior Stormwater Engineer City of Redmond PO Box 97010 Redmond WA 98073-9710

Dear Mr. Hitch:

RE: Request for Review and Approval of City of Redmond's Stormwater Facilities Plan

The Department of Ecology (Ecology) is writing this letter in response to your February 5, 2010 request for review and approval of the City of Redmond's Regional Facilities Plan (version dated February 5, 2010). Ecology appreciates the City's continued dedication to open and transparent communication on this topic and its commitment to fully implement the requirements of the Western Washington Phase II Municipal Stormwater Permit.

At this time, there are no design reports or drawings that require Ecology's formal approval. That said, I can clarify our support for your facilities' plan conceptual approach and address several points you raise in your letter.

First, let me state that the NPDES Phase II permit does authorize permitted jurisdictions to provide necessary flow control or water quality treatment of municipal stormwater at regional facilities, rather than at individual sites where redevelopment or new development occurs. We recognize that the regional facilities option is not highlighted in Appendix 1 of the permit, but want to assure you that it is available as a means of providing flow control and water quality treatment as required by the Phase II Municipal Stormwater Permit. Our review of Redmond's Regional Stormwater Facilities Plan indicates that, in concept, the City's regional facilities are being designed to provide all necessary flow control and water quality treatment required by Appendix 1 of the Phase II permit. This determination is based on our understanding of the following:

- The City is not proposing to alter either the standard flow control or water quality treatment requirements.
- The regional facilities are being designed to meet Ecology's 2005 Stormwater Management Manual for Western Washington design standards for basic or enhanced water quality treatment and (where appropriate) flow control.
- The facility designs will consider and accommodate future conditions based on full build-out and current zoning.

Mr. Steve Hitch February 23, 2010 Page 2

- The City will require implementation of Minimum Requirements #1-5 and 8 at all individual project sites.
- Regional facilities will be upgraded as needed to ensure that flow control and water quality treatment standards and requirements are met at all times.
- New development sites will be allowed to participate in the regional facilities program only after the facility that will receive stormwater discharges from those sites is operational. Redevelopment projects will be allowed to participate in the regional facilities program if the City has included the associated regional facility on the six-year CIP.
- If a regional facility in a given sub-basin has reached (or is nearing) flow control or water quality treatment capacity, the City will not allow stormwater discharges from all subsequent new and/or redevelopment sites in the sub-basin to be directed to the regional facility.

The information you provided in your letter further indicates that Redmond's regional facilities program will meet and likely exceed the flow control and water quality treatment levels required by the Phase II Municipal Stormwater Permit for the following reasons:

- The City will be retrofitting and providing water quality treatment for many pollutantgenerating land uses and areas that currently do not receive and would likely not receive flow control or water quality treatment for several years, possibly decades if such treatment were triggered only by new or redevelopment projects.
- The facilities will provide water quality treatment and (as appropriate) flow control for all sites, not just sites that clear at least one acre as is required by Permit Condition S5.C.4.

We are enthusiastic and excited by the City's progress on its regional facilities plan and continue to support the City's creative and innovative solutions to stormwater management. As you proceed with this effort, we encourage you to establish a careful tracking system so that you understand what volume of water quality treatment or flow control capacity is available to accommodate additional new or redevelopment projects. This will help ensure that the regional facilities perform optimally and are at no time overwhelmed or compromised. Please continue to call on either our regional municipal stormwater specialist, Anne Dettelbach, or our regional stormwater engineer, Ed Abbasi, for any ongoing technical assistance with this project and your broader Phase II compliance efforts.

Sincerely,

Kevin C. Fitzpatrick

Water Quality Section Manager

KCF:AD:bl

Cc: Anne Dettelbach

Ed Abbasi

NWRO Permit file WAR04-55