



August 28<sup>th</sup>, 2014

Rachel McCrea – Municipal Stormwater Specialist  
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3190 160<sup>th</sup> Ave SE  
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**RE: REVIEW OF KING COUNTY'S DRAFT SCOPE OF WORK FOR WATERSHED PLANNING IN THE BEAR CREEK WATERSHED**

Ms. McCrea,

Thank you for the invitation to provide comments on King County's Scope of Work for Watershed-scale Stormwater Planning of Bear Creek and to provide Redmond's perspective on the effort King County has executed to convene and lead the project. We would also like to take this opportunity to provide some feedback on permit modification language (both Phase I and II).

Redmond is concerned that the combined scopes of work for all counties, and the current level of participation of cities will not result in meaningful watershed planning. The current cost estimate for the region is over \$7,000,000, mostly funding modeling and data collection. After discussions with all parties involved, Redmond concludes this investment will only deliver studies instead of actionable strategies to address in-stream impacts from stormwater. Redmond is a proponent of watershed planning to restore streams. We know engineered solutions are cost prohibitive and will likely not address stormwater impacts alone. From verbal communications with Ecology staff, we understand that the objective of this permit requirement is to explore actions and planning/zoning modifications that can achieve a healthy watershed in combination with engineering solutions. We agree with exploring this, but don't think the currently scoped work of all counties will result in recommendations of strategies beyond engineered solutions. In addition, a planning/zoning/code discussion requires the involvement of planners, not just stormwater professionals.

**Bear Creek Scope of Work - Specific Comments**

**Section 1.1 Figure 4** – this figure illustrates little to no influence of the Urban Growth Boundary to reduce the expansion of impervious surfaces outside the urban growth area. If this is the case, Redmond suggests a more involved review of existing code to reduce projected impervious areas, protecting in stream habitat outside the urban growth boundary.

**Section 1.2** – previous studies are extensive, but do not include data collected by Redmond within the planning area. Redmond has water quality data, rainfall data, and continuous temperature data collected throughout the planning area over many years. In addition, other counties have identified using existing data for this project. King County's scope does not indicate a reduction in new data collection based on existing data.

**Section 2.1.1** – the scope includes 13 continuous temperature monitoring stations. Redmond and King County in the last decade collected continuous temperature data to inform the TMDL for Bear and Evans Creeks. This additional expense does not seem warranted and will likely not provide substantially more information than existing data.

**Section 2.1.2, 2.1.3, and 2.1.4** – all data collection needs identified by King County are far more than those proposed in other counties. No other county is proposing to monitor fish abundance and it is not clear why it is needed for this project.

**Section 2.2** – Redmond would like to have wetlands included in the mapping. We would like to have better estimate of future impervious than what is illustrated in Figure 4. Redmond has recently flown LiDAR in conjunction with another effort that likely cover most of the planning area. This data is much more accurate than older LiDAR data. Please use current LiDAR if possible. 83 catchments is a level of modeling detail beyond what is deemed sufficient in other counties.

**Section 2.4** – Redmond would like to have historic wetlands in the planning area modeled for historical conditions, instead of all lands modeled as forest. Wetlands have a very different hydrologic response than forested lands. Redmond does not agree with the assumption that other limiting factors, other than hydrology, should be ignored in modeling BIBI score improvements achieved by deployment of stormwater infrastructure.

**Section 2.5** – This section does not describe a process that includes input from the cities. The budget for this task is only 12% of the overall proposed budget, when in Redmond’s perspective this is the most critical and important portion of the project. Listed strategies to be evaluated are not clear. Future conditions should be based on the year 2040. This list of strategies in the scope are limited to stormwater infrastructure, which does not address “changes to development-related codes, rules, standards, and plans (S5.C.5.c.ii(5).a.” Planning strategies and in stream projects could be more cost effective than stormwater infrastructure solutions, and likely are needed in combination with stormwater infrastructure to ensure Bear Creek supports designated uses.

**Section 2.6** – This section does not describe a process for coordinating with cities within the planning area. An Implementation Plan and Schedule not agreed to by all parties is not going to have a positive effect. Implementation plan predesigns and project lists are not a permit requirement and should be removed from the scope.

**Section 2.7** – The cost estimate for public process is ten percent of the total cost and is much more expensive than the public process proposed by all other counties.

**Budget (provided to cities)** – In King County’s cost estimate, several of the categories identified as eligible for cost sharing with cities are not supported by permit modification language. These include: implementation plan and schedule, permit compliance reporting, and project management.

### **King County Leading and Convening this Effort**

Prior to the permit modification it was not clear Phase II jurisdictions were expected to financially support King County’s project. We were also not aware we had the ability to influence the project at the level detailed in the permit modification. Redmond understood that Phase II permittees must fully participate in watershed-scale stormwater planning and partnered with King County and applied for the National Estuaries Program grant to fund watershed planning in Monticello Creek, a tributary to Bear Creek.

King County and Redmond partnered to create a detailed implementation plan for stormwater, in-stream, and programmatic actions Redmond will implement to restore Monticello Creek. King County’s and Redmond collaboration was focused on Monticello Creek as outlined in the grant agreement. This collaborative effort in Monticello exceeded Redmond’s requirement under the Phase II permit and helped King County fulfill their permit requirement for Watershed Planning in Bear Creek.

King County did provide the Bear Creek scope to Redmond, but not in the context of reviewing the scope financially or to assess if the scope is meeting the objective of the Phase I permit requirement. Redmond has provided that level of review to inform this letter; however, the permit language is still not clear on the objective of this planning effort.

Prior to the permit modification, we supported other local jurisdictions who did not have grant funding in their position that participation did not include a financial obligation. When the permit modifications were published, King County notified the City that in addition to the grant-funded work in Monticello, Redmond would be

expected to contribute an additional \$70,000 for Watershed Planning in Bear Creek. The proposed cost share allocated to cities has included more than the permit modification language requires. As a result, Redmond reviewed the Scope of Work for the Bear Creek Watershed-scale Stormwater Plan in detail.

We are concerned that the costs and level of effort exceed what is needed to meet the intent of the permit language to produce strategies to restore designated uses. We think King County achieved permit compliance to date, but the new permit language, and the insight from discussions Redmond has had with Ecology staff, warrants a much more involved participation of the City.

### **Permit Modification Language**

Redmond appreciates the language changes to the Phase I permit that detail “all participating entities must be included in the scoping of work, identifying data needs, executing consultant contracts, identifying watershed characteristics, constructing and calibrating models” and “provide adequate opportunities for participating entities to provide input and feedback on all steps in the process.” Unfortunately, many of the deliverables have already been submitted by the counties to Ecology. As such, cities are unable to reverse the process to uphold the new language/requirements regarding coordination. This needs to be rectified so that this process is collaborative and cities are fully involved.

Redmond also appreciates the Phase II permit language modifications that limit the financial pro rata sharing of the cost to model development, calibration, model runs, and public involvement. Furthermore, the financial burden was not anticipated, nor budgeted for in approved budgeting by legislative bodies.

### **Overall Project Objective and Projected Outcomes**

The objective defined in the Phase I permit is not clear, making it challenging for counties to scope the project, and for cities to review the scope. The Phase I permit watershed planning requirements have resulted in modeling projects that are very expensive and will likely not result in executable strategies.

Redmond suggests that the projects need to be re-scoped, and not focused on data collection and modeling. The four projects should be collaborated and focused on outcomes beyond stormwater infrastructure. We can do this with the scientific justification of existing modeling projects, such as the WRIA 9 and Juanita Creek studies performed by King County.

Redmond proposes that the parties involved in this permit requirement meet as soon as possible to discuss with Ecology the intended objective(s) of this permit requirement and explore potential alternatives to the currently scoped work; alternatives that are cost effective, outcome based, and include all parties. Then as a group decide if we should/can change the trajectory. We have the engineering tools to address some development impacts but agree that prevention of impacts is a worthwhile exploration.

Respectfully,



Andy Rheume – Senior Watershed Planner  
City of Redmond Stormwater Utility