August 19, 2010
LID Stormwater Standards
Comments submitted by Cathy Beam, AICP, City of Redmond
Implementation Advisory Committee Member

First I would like to acknowledge the time and effort that went into this project by Ed O'Brien, Bill Moore, and Harriet Beale. This is a daunting task and your work needs to be recognized. Additionally, thanks to Kate Snider for keeping the Committee members on task and moving us forward.

Overall, I believe we are headed in the right direction and the document reflects much of what was discussed over the past several months. I agree that local land use codes are an integral part to the success of LID and that jurisdictions need to address changes in these documents and not just their stormwater regulations.

I offer the following comments, some of which I mentioned at our meeting on August 12th.

1. It would be extremely helpful if you could illustrate the relationship between wellhead protection zones/critical aquifer recharge areas for a municipal water supply and LID BMPs. The *Feasibility Review Criteria* document mentions site/engineering constraints. For both bioretention/rain gardens and permeable pavements, one of the constraints is, "Within 100 feet of a drinking water well, a spring used for drinking water supply…" Could this be expanded or clarified to address wellhead protection zones/critical aquifer recharge areas? Roughly half of the City of Redmond is served by municipal wells, drawing from an aquifer that is ranges from approximately five to 15 feet below the ground surface depending upon location and time of year. We get a lot of pushback in implementing LID techniques in these areas due to our shallow aquifer.
2. A city's Comprehensive Plan sets the community vision for future growth in the jurisdiction. Under Growth Management, jurisdictions are required to plan for future growth targets that are designated and set regionally and state-wide. Additionally, Urban Centers are designated under GMA, to focus development in these areas. The *Feasibility Review Criteria* document includes a section on Competing Needs. Specifically, it states, "The LID requirement is not superseded by: local community values and vision; Growth Management Act requirements." I don't necessarily believe LID and GMA requirements are mutually exclusive; however, I do believe there needs to be some reconciliation between these two important ideals. Redmond has two designated Urban Centers. Development standards in these areas, in relationship to the balance of the City, are dense and could include lot line to lot line development. Some LID applications might be technologically feasible, but there is a chance that the targets could not be met.
3. The previous comment provides a segue to this comment. There should be some flexibility in meeting the target on a watershed/basin plan approach. What exactly is a watershed or basin still needs to be defined with respect to this exercise. This

approach could allow the flexibility needed for jurisdictions to meet both GMA mandates and LID requirements. For example, perhaps a developer of property in an Urban Center could purchase develop rights of land within the same watershed/basin in order to offset the intensive development. I think we need to encourage creativity in approaches without compromising the target. Pilot projects could be considered.

4. "Significant increase in density" for a trigger should be modified to reflect total impervious surface. There are some land uses that could be more intense from a density perspective, but have less impact in impervious surfaces.
5. Education will be critical to the success of implementing LID. DOE should implement training programs in anticipation of the effective date of the new permit.
6. LID facilities will require a shift in the maintenance approach. I think this warrants more discussion. For instance, how will city inspectors inspect a green roof on top of a multi-story building? What sort of permissions will be required? Can you put a stormwater easement over the roof? These are traditional type questions that may be raised for non-traditional type facilities.