

**City of Tacoma Comments on March 2016 Draft of Building Cities in the Rain – Watershed
Prioritization Guidance for Stormwater Retrofits**

General

1. Throughout the guidance document, the term stormwater retrofits is used. It appears to be used in terms of new development, redevelopment, and actual retrofit situations. Provide a definition specific to this document.
2. Throughout the document, utilize terms and definitions from the NPDES Municipal Stormwater Permit and Ecology's Stormwater Management Manual for Western Washington as much as possible.

Anticipated Results – Page 4

3. It appears based upon the language, "Prioritization provides a tool for targeting the location of an investment in regional detention facilities." that this document is specific to regional detention facilities, is this the intent of this document or this document intend to be more broad and encompass all stormwater facilities.

Section 1.1 – Page 6

4. "A thoughtful prioritization..." Thoughtful should read thoughtful.

Section 3.1.1 - Page 11

5. Bullet 3 – remove the text within the parenthesis "(for the range of pre-developed discharge rates from 50% of the 2-year peak flow up to the full 50-year peak flow)" as it is more detail than is needed in this document and the flow control component of MR #5 is not described, nor is the differing requirements for MR #5. This document should contain just general information regarding the Minimum Requirements.

Section 4.2 Page 21

6. Provide definitions of protection, conservation, restoration and development.

Section 5 page 23

7. Second paragraph states "because a jurisdiction may choose to include runoff treatment and LID in a transfer program". Current Ecology guidance is for flow control only and it may not be possible to transfer all LID requirements to regional facilities. Revise this paragraph to avoid confusion regarding what may be transferred to a regional facility.

Section 8 Page 35

8. Revise this section to be more general and reference Ecology's Stormwater Control Transfer Program document rather than seeming to provide specifics on the approval process.