

Comment No.	Volume	Section	Comment	Response	Edit
1	I	4.2.5	<p>We appreciate the addition of this clarification regarding compliance with Minimum Requirement #5: "If all BMPs in the list are infeasible, then the designer must document the site conditions and infeasibility criteria used to deem each BMP infeasible. This documentation will demonstrate compliance with Minimum Requirement #5."</p>	<p>We wish we could take credit, but this is an addition in the 2019 Ecology manual (Volume I, Section 3.4.5 MR#5: On-site Stormwater Management).</p>	<p>No change</p>
2	I	4.1.2	<p>This language makes redevelopment more difficult. In addition, how is interior improvement value calculated - this can become quite subjective. "For all other projects: the valuation of the proposed improvement, including interior improvements, exceeds 50% of the assessed value of the existing site improvements."</p>	<p>This is an addition in the 2019 Ecology manual (Volume I, Section 3.3: Applicability of the Minimum Requirements).</p>	<p>No change</p>
3	I	4.2.6 4.2.7 4.2.8	<p>Threshold Discharge Areas: We would like to note for the record that Kitsap County is more restrictive than DOE by not allowing the use of TDAs. This is not in the best interest of Kitsap County, particularly in the affordable housing arena and on road construction/maintenance projects. We believe that TDAs are recognized by Ecology because they understand that small sites can't be designed down to the nth degree. Suggested Change: Continue to use the KCSDM as written in regards to restrictions on TDAs but allow engineers to submit requests to be allowed to use TDAs as specified by the WDOE Manual for projects when the engineer believes it makes sense. This process would occur for a test period. At the end of the test period, perhaps until the next update, assessment can be made whether or not to include TDA's in the manual.</p>	<p>The 2007 NPDES permit issued by the Department of Ecology contained a provision in section S5, item 4 that stated, "Permittees shall not repeal existing local requirements to control stormwater that go beyond the requirements of this permit for new development and redevelopment sites." This required Kitsap County to continue the practices implemented since that initial permit.</p> <p>In 2009, The Board of Commissioners adopted the Water is a Resource Policy in 2009 and reaffirmed the policy in 2016. This policy was the guiding document behind not allowing sites to be divided into smaller TDAs that could lead to higher discharge flow rates than would be allowed under the current site application method. In particular, the policy directs DCD in its creation of development regulations, to use the guiding principles of the policy. The guiding principles that directs minimizing runoff are:</p> <ul style="list-style-type: none"> - Preserve natural hydrology <ul style="list-style-type: none"> -First, preserve natural hydrology by preventing the creation of stormwater runoff -Where runoff is unavoidable, ensure it is free of pollutants - Maintain Natural Low Energy Flow Regime -Reduce Runoff's pollutant carrying capacity -Reduce Runoff's destructive potential. 	<p>No change. This item will be highlighted in the training.</p>
4	II	3.5.1	<p>Vol 2 pg 47 Source Control: Are covered dumpster enclosures back? Didn't Kitsap County abandon the implementation of this requirement?</p>	<p>This is a clarification of the requirement per the 2019 Ecology Manual, Volume IV, Chapter 4, S427 Source Control BMPs.</p>	<p>No change. This item will be highlighted in the training.</p>

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5	II	5.3.2	Vol 2 Pg 91 Full Dispersion: It is disappointing that buffers cannot be used for dispersion flow path lengths. This seems to go against the promotion of LID and MR#5. This will limit the ability to utilize dispersion. Suggestion: Allow dispersion to occur within a wetland buffer given proper determination by the project biologist that the wetland itself already provides water quality treatment function and using dispersion will be superior and promote the overall system function compared to using another BMP. Update the CAO to allow for greater than 25% administrative buffer reductions if the reduction is to be used for dispersion flow path.	Kitsap County is following the limitations set forth by Ecology, specifically in the 2019 Ecology manual, Volume V, Chapter 3, Section V-3.1, BMP T5.30, where it states: "The dispersion area is not allowed in critical area buffers or on slopes steeper than 20%."	No change
6	II	1.1.4	Does the UIC requirement apply to bioretention facilities with underdrains or only to infiltration trenches with perforated pipe? What is the purpose of this requirement? It feels like just another hoop with little added benefit. What is the process – does the engineer need to contact DOE every time an infiltration trench is proposed prior to submitting an SDAP? Is this required for SFRs, too?	Per Ecology's UIC program requirements (Volume I, Section I-2.14 Underground Injection Control [UIC] Program), bioretention facilities with underdrains are considered a UIC if "intending to infiltrate water from a perforated pipe below the treatment soil". This program stems from the federal Safe Drinking Water Act and Ecology implemented this program on behalf of the US EPA. All UIC wells must be registered except "wells at single-family homes (or duplexes) receiving only residential roof runoff used to collect stormwater runoff from roof surfaces on an individual home (or duplex) or for basement flooding control". Refer to Volume I, Chapter 1-4 of the 2019 Ecology manual for more information.	No change. This item will be highlighted in the training.
7	Appendix G	G.3.4	What is the purpose for requiring large PITs to be documented and staked by a licensed land surveyor? Locations can be estimated by measuring or on handheld devices - requiring a land surveyor adds unnecessary costs.	This is a requirement per the 2019 Ecology manual, Volume V, Section V-5.4 Determining the Design Infiltration Rate of the Native Soils.	No change
8	Appendix G	N/A	Why is grain size analyses no longer an option for determining infiltration rates? Suggestion: KC continue to use the policy, outside the manual, to allow gradation for infiltration in soils not glacially consolidated (note, DOE allows this). Allow that policy to continue to be utilized when the engineer can make the argument site should qualify. Simply don't throw out the policy that was created because it makes sense.	No change from 2016 Kitsap manual.	No change
9	N/A	N/A	We would like to understand which figures and charts changed and what the changes are. We were not provided the "file for Public Draft figures"	The updated figure packet is provided on the Stormwater Manual Update website (www.kitsapgov.com/dcd/Pages/Stormwater_Design_Update.aspx). A list of new and updated figures can be found in the Key Changes Matrix (also posted on the Stormwater Manual Update website).	No change. This item will be highlighted in the training.

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10	N/A	N/A	We would like to note that KPUD has rainfall gauges all over Kitsap County, yet WWHM has zero information from Kitsap County. While this is beyond the scope of the current manual revisions, we would like to see WWHM be updated to include rainfall data from Kitsap versus being forced to use rain gauges in Quilcene, Seatac and Everett.	Comment noted	No change
11	I	4.2.5	Table 4.3 doesn't cover greater than 5 acres sites inside a UA	If the sites falls into this category, the list approach cannot be used; the designer must use Table 4.2.	No change. This item will be highlighted in the training.
12	I	4.2.5	List 2B doesn't allow full dispersion on downspouts, why?	This is a carry over from the 2016 Kitsap manual; Table 4.2 shows that new and redevelopment projects have the option to do Full Dispersion; or LID Performance Standard; or List #2B. If we had added Full Dispersion to the list, for example in List #2A, users would then be required to evaluate it first and use it if not demonstrated to be infeasible. This provides more flexibility.	No change. This item will be highlighted in the training.
13	I	4.2.5	Why is permeable pavement #1 on the hard surface table for rural areas. Why is rural more stringent than UGA/UA?	This is a carry over from the 2016 Kitsap manual; same response as above.	No change. This item will be highlighted in the training.
14	II	Chapter 8	The critical drainage area maps were recently updated, but are now reverting back to the previous maps. Can the county better show and define on the maps the problem areas/culverts/systems? In addition, have any county stormwater SWMM upgrade projects addressed any of the critical drainage area concerns – e.g., Manchester, Koch Creek update at the ACE pond etc.? If so, the critical drainage areas should be updated accordingly.	Specific assets cannot be shown due to the scaling of the maps. The CDAs identify the problem areas or areas that are environmentally sensitive. Yes, Manchester and Koch Creek both have had capital projects constructed to address known stormwater issues. However, most of Manchester still is considered a CDA; Koch Creek was not designated as a CDA in the 2016 Kitsap manual. The maps have been updated accordingly and have removed the Gamblewood, Edgewater and Miller Bay Estates areas as well as a portion of Manchester that was addressed by the stormwater park.	Maps have been updated. Changes will be covered in the training.
15	N/A	N/A	Can bioswales be added as a runoff treatment option?	Water quality data still suggests that biofiltration swales and filter strips do not consistently perform at a level equal to the basic treatment standard.	No change
16	II	1.5.3	Why can't a performance surety be accepted in lieu of construction completion for subdivisions with private roads?	Historically performance sureties have been difficult to collect and therefore not able to be used to finish improvements that the developer did not complete.	No change
17	II	5.3.2	Section 5.3.2 – why aren't small PITs allowed for projects with >=1 acre of impervious? Did DOE make this change?	The 2016 Kitsap manual did not match 2019 Ecology manual for this size project. Edited to comply with the 2019 Ecology manual.	No change. Infiltration feasibility assessment will be covered in the training.

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18	II	5.4.8	Section 5.4.8 – why is infiltration under impermeable pavements not allowed in lieu of permeable pavement?	Sentence was revised to clarify that infiltration under impermeable pavements is only allowed outside of public rights of way.	Rejected deletion and revised sentence to read, "While not explicitly addressed in this section, infiltration may be allowed under impermeable pavements, outside of public rights of way, in lieu of permeable pavement."
19	N/A	N/A	Were changes made to the "Site Assessment and Planning Packet"? It was not included in the appendices.	No changes were made to Appendix C. See the full PDF Manual posted on the Stormwater Manual Update website (www.kitsapgov.com/dcd/Pages/Stormwater_Design_Update.aspx).	No change. This item will be highlighted in the training.
20	Appendix A	Glossary	The definition of steep slopes needs to have a sentence added that manmade slopes aren't covered under the definition. If a slope was designed at 2:1, then a future development shouldn't require another Geotech just because it exceeds 30% and shows up on the map.	All slopes are included due to site conditions changing over time.	No change