			ı	City of B	Bend S	Stormwater Master Plan - Pub	lic Con	nments	
	Date:	April 2, 20	14	Project	Name:	Stormwater Master Plan			
Affilia	ation:	City of Ber	nd	Sub	mittal:	Public Comments on December 2008	Draft		
Revie	wers:	Alissa Maxwel	ll, Erik	Huffman, (	man, Chris Henningsen, Central Oregon Irrigation District				
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Item #	tem # Page/ Paragraph Reviewer			eviewer		Comments	Type	Consultant Response	
1	General Alissa Maxwe (1/29/2009)			Concerned that costs are excessive.  City is reviewing other high costs.		City is reviewing other alternative high costs.	es due to		
2 General Alissa Ma (1/29/200			pretre	s to require more infrastructure for atment, etc., than DEQ will likely e in your UIC permit.		DEQ is re-visiting requirements for pretreatment and these requirement reflected in the City's WPCF per Note: The City decided to wait to Master Plan until after the permit issued. The City received the per 2013 and the Master Plan being	ents will be mit. o finish the was ermit in Mag		

The stormwater drywell retrofit treatment

cartridges would be worth looking at as a

cartridges every 2-3 years.

Plan?

cost comparison. Assume replacement of

Has DEQ participated in the review of the

be reflective of the regulatory clarity.

No formal review from DEQ has been

helped shape this revision.

requested, although a DEQ staff person

actively participates on the City's Stormwater Quality Public Advisory Committee that has reviewed the plan, and staff were notified of public review opportunities. The City did meet with DEQ managers to discuss stormwater quality concerns related to the Master Plan and to obtain further DEQ direction on regulatory issues in November 2009. The results of that meeting have

however, the cartridges were cost

prohibitive.

Costs were obtained from the manufacturer.

COMMENT TYPE:	'F' - FATAL FLAW MUST BE REVISED

General

General

3

4

Alissa Maxwell

Alissa Maxwell

(3/10/2009)

(1/29/2009)

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Date:	Date: April 2, 2014 Project Name: Stormwater Master Plan								
Affiliation:	ffiliation: City of Bend Submittal: Public Comments on December 2008 Draft								
Reviewers:	Reviewers: Alissa Maxwell, Erik Huffman, Chris Henningsen, Central Oregon Irrigation District Pa								
II # D.	The Consultant Property								

Item #	Page/ Paragraph	Reviewer	Comments	Type	Consultant Response
5	General	Alissa Maxwell (3/10/2009)	Concern about installing major pipelines throughout City;		Given the new regulator clarity, the revisions no longer recommend a citywide collection system. Costs for construction of a collection system will be included in the final plan for cost comparison with other alternatives.
6	General	Alissa Maxwell (3/10/2009)	Plan assumes all drywells need to be retrofitted or decommissioned.		The Stormwater Master Plan has been revised as a result of the UIC permit process. It is unlikely that all drywells will need to be retrofitted or decommissioned. Evaluation of other alternatives is now included, such as Low Impact Development, regional detention, retaining drywells with feasible. Regional facilities have been evaluated – cost of land is high and requirements for regional detention require multiple acres of land to construct.
7	General	Alissa Maxwell (3/10/2009)	City should initially conduct a risk assessment and then a groundwater vulnerability study and update drinking water protection areas.		The City completed a UIC risk assessment September 21, 2011, updated the drinking water wellhead protection areas in 2011 and the source water assessment in 2013.
8	Page 4-1	Alissa Maxwell (3/10/2009)	Page 4-1 - Treatment of private stormwater prior to discharge to drywells		The City requires private facilities to meet DEQ requirements and be registered with DEQ. Bend Code Title 16 (adopted January 2012) incorporates stormwater treatment

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								of 9	
Item #	Item # Page/ Paragraph Reviewer				Comments	Type	Consultant Response		

Item #	Page/ Paragraph	Reviewer	Comments	Type	Consultant Response
	0.01/0.00	Alissa Maxwell	Section 6.2.1/6.2.2 Does the City have		requirements including adoption of the Central Oregon Stormwater Manual (2010). The City has separate Integrated Stormwater
9	Section 6.2.1/6.2.2	(3/10/2009)	stormwater runoff and water quality plans?		Management Plans focusing on stormwater quality requirements as well as a stormwater monitoring plan.
10	Figure 5.2	Alissa Maxwell (3/10/2009)	Figure 5.2 is misleading.		Figure title has been changed for clarification. The new title is 'General Surface Water Drainage Patterns'.
11	Section 6.3.4	Alissa Maxwell (3/10/2009)	Higher groundwater lenses are not the same layers as drinking water well layer		The text has been repaired.
12	Section 6.3.5	Alissa Maxwell (3/10/2009)	Sedimentation manholes or catch basins can also be used to retain spills		So noted and incorporated into Section 6.3.5.
13	Chapter 6	Alissa Maxwell (3/10/2009)	<ul> <li>Chapter 6 includes a number of recommendations. Specific Questions about what is included in the costs:</li> <li>Other alternatives considered?</li> <li>Assessing stormwater impacts to the Deschutes River</li> <li>Sediment traps upstream of Mirror Pond</li> <li>Groundwater vulnerability study</li> <li>Re-delineating DWPA areas</li> <li>Hydrodynamic separators</li> <li>Sediment manholes for drywells</li> <li>Sediment traps for detention facilities</li> </ul>		The revised plan includes evaluation of alternatives such as regional systems, some piping on the west side and retaining drywells on the east side of the Deschutes River.  Costs for assessing stormwater impacts to the Deschutes River are not included.  Costs for installing sediment traps upstream of Mirror Pond are not included at this time.  A groundwater vulnerability study has been completed (GSI, Pollutant Fate and Transport Model Results in Support of the City of Bend UIC WPCF  Permit – Groundwater Protectiveness  Demonstration and Proposed EDLs, 2011).

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							Re-delineating Drinking Water Pro	otection	

Item #	Page/ Paragraph	Reviewer	Comments	Type	Consultant Response
					Re-delineating Drinking Water Protection Areas (DWPA) has been completed. Costs for hydrodynamic separators/trash removal have not been included. Sediment manholes are not included for drywells, sediment traps are expected in forebays to detention facilities.
14	Table 8.1	Alissa Maxwell (3/10/2009)	Table 8.1 shows a discrepancy in costs.		Repairs have been made to Table 8.1. Catch basin cleaning and other maintenance efforts are Class 5 master planning level only and will be refined upon implementation by the City.
15	Page 9-7	Alissa Maxwell (3/10/2009)	Page 9-7 – discrepancy in costs noted.		Costs have been revised and included in Chapter 10. Discrepancy in specific costs, now in the Appendices, has been repaired.
16	Table 8.2	Alissa Maxwell (3/10/2009)	Table 8-2 shows a discrepancy in administration costs.		Discrepancy has been clarified for administration costs.
17	Page 8-10	Alissa Maxwell (3/10/2009)	Public information costs need clarification		Public Education and information costs have been clarified.
18	Table 9.1	Alissa Maxwell (3/10/2009)	Table 9.1 – drywell life expectancy could be increased with maintenance		Note has been added on the potential of increasing life expectancy with additional maintenance.
19	Table 9.2	Alissa Maxwell (3/10/2009)	<ul> <li>Questions re: Table 9.2;</li> <li>Pros and cons needed for each alternative considered;</li> <li>Maintenance costs need to be considered and added;</li> </ul>		Pros and Cons have been added to Table. Ongoing maintenance is not the concern for regional detention systems; the issue voiced by some maintenance departments is the need for different equipment and different

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			T					of 9		
Item #	Pag	ge/ Paragraph	R	eviewer	Comments	Type	Consultant Response	e		
					<ul> <li>Smaller pipe can be used for regional detention systems;</li> <li>Cost comparison of alternatives would be useful.</li> </ul>		expertise to maintain vegetated so This may not be an issue for all just Positive note added regarding so required for regional detention; so are included in the collections says A cost comparison between piperand retaining drywells with pretres included in the final draft master	urisdictions. naller pipe maller pipe stem costs. d system eatment is		
20	-	Table 10.9	Alissa Maxwell (3/10/2009)		There are no collection system piping costs in Table 10.9.		Costs for collection system piping is include in the final draft plan.			
21		General		Maxwell (2009)	Include costs for groundwater vulnerability study and other water quality monitoring programs		Groundwater vulnerability study has completed; stormwater quality moreosts are dependent on the City's permit requirements, and are calculated \$151,000 (2014\$). A monitoring UICs has been completed in 2015	onitoring s WPCF culated at plan for		
22	P	age 10 - 12		Maxwell (2009)	Would regional detention eliminate the needs for piping?		Not entirely. Piping likely would be to direct stormwater to regional disasins and would be dependent a locations of the regional detention Regional detention isn't feasible if due to steep slopes and land avainew strategy approaches encompregional detention and other mean added flexibility.	letention on the exact in basins. in all areas hilability. The pass		

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Reviewers:	Alissa Maxwell,	Erik Huffman, C	Chris H	enningsen, Central Oregon Irrigation	District		Page 6		
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Itom # Pag	m # Paga/Paragraph Reviewer Comments Type Consultant Response								

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23	General	Alissa Maxwell (3/10/2009)	Conceptual Question: Would it be less expensive to create a combined/storm sewer system?		No. There is insufficient hydraulic capacity at the WWTP.
24	General	Erik Huffman (2/5/09)	Hopes that Bend can be at the forefront of innovative sustainable design. Hopefully, not filter inserts – too expensive.		The City of Bend hopes to implement Low Impact Development solutions, innovative on-site solutions, prior to other methods of stormwater treatment and conveyance.
25	General	Chris Henningsen	When is it expected to be implemented?		The City of Bend decided to wait until DEQ had completed their process to develop a Water Pollution Control Facility (WPCF) permit to regulate construction, operation and maintenance of drywells in the City. We would like to finalize the Master Plan in 2014 and begin formal implementation in FY2014-15.
26	General	Chris Henningsen	CoB currently only allows drywells in the ROW. Will that standard change?		The City already does allow other facilities than drywells in the ROW. Additionally, the City adopted Bend Code Title 16, a Stormwater Ordinance, in 2012 that includes significant requirements related to stormwater.
27	General	Chris Henningsen	When might we expect standards, design and otherwise, to change? When might we be seeing some of these plans implemented?		The City adopted Bend Code Title 16, a Stormwater Ordinance, in 2012 that includes significant requirements related to stormwater. Revisions to the Central Oregon Stormwater Manual (COSM), incorporating DEQ review comments among others, were

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					completed in August, 2010. The COS have been adopted by reference in bo Bend Code Title 16 and the City's Star and Specifications.			
28	Chapter 10 Chris Henningsen		Need to show economics of suggested strategies versus status quo.		A cost comparison of alternatives has be included. Acceptability of status quo we unknown until finalization of State Underground Injection Control (UIC or drywell) regulations.			
29	Figure 5.2	Chris Henningsen	Figure 5.2 – Are those basic surface water drainage, groundwater drainage, or both? Fix title to describe.		Surface water drainage – figure title has been changed to 'General Surface Wate Drainage Patterns'.			
30	Figure 5.1 Chris Henningsen		Figure 5.1 – MB 37 doesn't seem to be complete – seems to be part of MP17. Was this a typo?		MB 37 is an isolated small sub-area that been determined to be the highest priori resolution due to safety risks, visibility, a frequency of flooding. A solution is bein implemented for this area.			
31	General	Central Oregon Irrigation District	A memo titled: "Central Oregon Irrigation District, Comments for the City of Bend's Storm Water Master Plan", including two attachments,		See responses below.			

• ATTACHMENT 1: Applicable

 ATTACHMENT 2: Oregon Water Resources Congress, Perspectives on Managing Storm Water in District

Statutory and Regulatory Definitions,

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32	Page/ Paragraph  General		Central Oregon Irrigation District	Canals, November 29, 2007, An Attorney's Perspective, and  • ATTACHMENT 3: Figure 10.7 of the Master Plan indicating areas of concern.  The memo provides a history of stormwater matters that impact the District and regulatory and environmental issues. These concerns are echoed in the Attorney's Perspective in Attachment 2. The District requested two changes to the draft Stormwater Master Plan including:  Several crossings of District irrigation canals are necessary to build the system identified in the master plan. These crossings will be permitted by the District, however, the crossings will need to refrain from interfering with operations and maintenance of District facilities, meet District specifications and standards, and		The piped system alternative is no preferred alternative in this area of and the route has been moved to appendix.	of the City				
33	F	igure 10.7	Central Oregon Irrigation District	as possible. Crossing licenses will need to be obtained.  There are two areas in Figure 10.7, Attachment 3, that include use of District easements. The District		This route is one identified for new sewer pipe and was chosen to satusing the same easement as the	ve costs by				

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						requests these projects be removed from the Capital Improvement Program.		sewer. The piped system alternation longer the preferred alternative in the City and the route has been appendix.	this area of				
34		General		al Oregon on District		There are other irrigation districts that operate in the City of Bend and they need to be coordinated with to address their specifications and standards.		So noted. See also previous resp	oonse.				

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