

LID Comments from City of Tacoma

Proposed Requirement for Basin-Scale Approach

From the information provided it is unclear as to the intent of the Basin-Scale Approach. It is our understanding that jurisdictions will be required to conduct an analysis of impacts to water quality and hydrology but it does not clearly define how this information will be used once it is obtained. It appears that the Department of Ecology does not believe that Best Management Practices as defined in the Stormwater Management Manual are sufficient to mitigate impacts of development and that jurisdictions will be responsible to determine specific impacts in their community and find alternative ways to mitigate for these impacts, including but not limited to limiting the amount of impervious surfaces allowed in given areas. Please further define what the basin-scale approach is attempting to achieve and how DOE will determine if a given jurisdiction's proposed mitigation is appropriate.

Low Impact Development Minimum Requirements for New Development and Redevelopment

You need to clearly define what happens when LID is infeasible. As written it is unclear what happens if a project is not able to meet the requirements of Mandatory List #1, Mandatory List #2, or the LID Performance Standard. Is the development not allowed to proceed? Are they required to ask for an Exception to a Minimum Requirement? Or is LID just infeasible at the site and the site can continue development?

Low Impact Development Minimum Requirements for New Development and Redevelopment

It needs to be made clearer that the LID requirements will constitute a change to Minimum Requirement #5 and that all "hard" surfaces will require a feasibility check for infiltration.

Low Impact Development Minimum Requirements for New Development and Redevelopment

The Treatment Credits section is somewhat misleading. As written it seems to say that a site can provide LID to a portion of the site and by doing so will not be required to provide stormwater treatment for all surfaces that would normally require such treatment. (For example, there is a site that has 7000 square feet of PGIS. The site could infiltrate with treatment 2001 square feet of PGIS and only be left with 4999 square feet of PGIS, which is below the treatment threshold.) Please refine this section to avoid any confusion about how credits can be applied.

Attachment #1 – Feasibility Review Criteria

The Competing Needs Section is confusing. It is unclear as to the intent of this section and what the jurisdiction or developer is supposed to provide. Please elaborate.

Please direct any questions you may have concerning these comments to Merita Pollard at mpollard@cityoftacoma.org or 253.502.2103.

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