

From: Wally Costello
Sent: Friday, August 27, 2010
To: Ed O'Brien
Subject: Comments to the Draft LID Requirements

Following the last Joint Advisory Committee meeting below are written comments as requested to meet the August 27th deadline.

1. Tools Available to Meet Performance Standards

It was apparent to me that in the materials prepared for the August 12th meeting that when builders and designers are designing their systems to meet the performance standard they can use what ever techniques and tools that are available to meet the performance standard regardless of whether a tool or technique is a LID technique so long as they are meeting the performance standard. This assumption was confirmed during the meeting and I want to encourage Ecology to preserve this assumption as it will help contribute to the success of a project meeting the performance standard.

2. Definition of Significant

The proposed definition of significant as 80 acres, or, greater than or equal to 5% of the UGA which ever is smaller will in a lot of cases be 80 acres. For example the City of Bonney Lake, according to their web site, is 5.5 square miles therefore 5% would be approximately 175 acres. By this definition, in the City of Bonney Lake (which is not a very big city) 80 acres would be significant. The 80 acres will further be reduced for development by open space, storm facilities, public street improvements etc. therefore I would recommend the 80 acre threshold be increased and I would encourage further review for a logical minimal number of acres as the threshold for significant.

3. Identification of Permeable Pavement Infeasibility and Competing Needs

It appears there will be a conflict between impermeable pavement with redistribution of runoff below the pavement with road designs requiring a certain level of compaction to preserve the pavement section. Regardless of how many daily trips there are for a certain road, the design criteria will probably have requirements for wheel loads to accommodate trucks, fire engines etc. This design criteria will probably be 95% compaction. Possibly having to remove material to create a layer to infiltrate storm water with a section above compacted to support certain wheel loads seems to be a conflict. If an existing layer of permeable soil does exist and the road section above this layer still has to be compacted to meet specifications the road section will be relying upon the existing permeable layer which probably will not support the wheel loads creating possible settlement and pavement failure.

Once a road is constructed there always seems to be future work by a variety of utility companies cutting into a road section for additional wet or dry utilities or repairs. If under the road section there is an infiltration system it will be hard to control the damage in the future to the infiltration system by these utility crews cutting into the road section and infiltration system.

My suggestion is to allow for the storm water to be collected and conveyed to a retention/infiltration system (subject to soils supporting infiltration) in close proximity to the road so the storm water is being infiltrated but not under the road.

4. Deadline for LID development code updates

Taking into account all of the issues associated with schedule it appears to me Ecology proposing to align the deadline for LID development code updates with the new GMA update deadlines is a logical solution to schedule.

5. Green Roofs

I agree with Ecology that green roofs have not been introduced into mainstream residential development to date and requiring green roofs would create a conflict with providing affordable housing.

6. Rain Gardens

We are assuming rain gardens can be part of a projects open space.

7. Maintenance

As discussed during the committee meetings ongoing maintenance will be a challenge to enforce particularly if it is a home owners association having to enforce maintenance upon an individual home owner. The local jurisdictions still seem to be the most logical entities to assure ongoing maintenance.

Thank you for this opportunity to submit comments. I look forward to seeing the draft permit language.

Wally Costello