

# City of Poulsbo

*Public Works Engineering Division*



June 17, 2011

Ms. Harriet Beale  
Municipal Stormwater Permit Comments  
Washington State Department of Ecology  
Water Quality Program  
P.O. Box 47696  
Olympia, WA 98504-7696

RE: Phase II Draft Permit Language

Dear Ms Beale:

The City of Poulsbo has very limited staff resources to participate in extensive review of future Stormwater Permit direction, but we do welcome the opportunity to contribute on this topic.

Comments have been provided by the Regional Road Maintenance ESA Forum (of which the City of Poulsbo is a member) in a comment letter dated June 7, 2011. The City would also like to endorse the comments contained in the WSDOT June 16, 2011 letter to the Department of Ecology. This letter was authored by Megan White, WSDOT Environmental Services Director. City staff feels that many of the WSDOT comments very closely track concerns shared by the City of Poulsbo.

In addition, the City would like to provide the following comments:

The City would like to point out that we have yet to complete a review of a single project under the regulations imposed by the 2009 permit modification. While City staff is diligently working on coming up to speed with the new regulations, we do not feel that the additional requirements proposed for requiring LID can be reasonably accommodated by the limited staff time available.

While the City understands the need to remove the 1 acre threshold exemption for permittees that were not previously regulating stormwater below 1 acre disturbed and thusly continue to not regulate stormwater at all below the 1 acre threshold, we do not feel that ramping up the regulations for under 1 acre projects to the full 2005 DOE Stormwater Management Manual for Western Washington regulations is appropriate at this time. In the case of Poulsbo's urban environment, many of the opportunities for improving Puget Sound water quality involve the redevelopment of under 1 acre parcels that were developed long in the past, at a time when no water quality or quantity control features were required at all. Carrying forward with regulations that would impose the full measure of the 2005 Stormwater Management Manual for Western Washington will only ensure that these properties do not redevelop at all due to the financial

burden involved in compliance. The City feels that allowing regulation of under 1 acre parcels to the requirements of the 1992 DOE Stormwater Management Manual for the Puget Sound basin or equivalent is a reasonable compromise. This provides the economic and other benefits to the City and its residents of redevelopment of existing parcels, as well as providing the environmental benefits of water quality treatment and quantity control that did not exist previously. It should be noted that the water quality requirements of the 1992 manual approach are not all that different from those in the 2005 manual approach. The City would like to recommend that those Phase II permittees that have been regulating stormwater for under 1 acre parcels at the 1992 DOE manual level (at a minimum) be allowed to continue regulating the under 1 acre parcels at that level.

At a minimum the City would recommend some form of lesser requirements for redevelopment of parcels under 1 acre that do not impose the financial burden of the full measure of requirements contained in the 2005 manual requirements in order to encourage the redevelopment of parcels which are currently not providing any water quality treatment or quantity control and which would likely not otherwise redevelop under the new regulations.

Thank you for the opportunity to provide comments on the draft language.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrzej Kasiniak".

Andrzej Kasiniak, P.E, City Engineer  
City of Poulsbo