



CITY OF PULLMAN

Public Works and Planning Departments

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July 6, 2011

Municipal Stormwater Permit Comments
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

To Whom It May Concern,

The City of Pullman appreciates the opportunity to provide input on the preliminary draft language relating to the re-issuance of the NPDES Phase II Municipal Stormwater Permit for Eastern Washington (WA) and offers the following comments.

Low Impact Development (LID)

In general, the City supports the use of LID as a means of reducing stormwater runoff that must be managed in municipal stormwater collection systems and then discharged to surface water. Reducing and managing runoff on-site is important for both improving surface water quality and protecting downstream property owners from flooding. In our experience, however, these requirements need to reflect local conditions such as topography, geology and soil type. For example, retaining the 95th percentile/24 hour storm on-site would not be practical in areas within the City of Pullman where there are steep slopes, shallow bedrock or soil with extremely poor infiltration rates. There are examples of development projects in town where infiltration was tried and did not work. We require geotechnical reports for all new development and re-development over an acre in size. For the required "feasibility review" mentioned in the preliminary draft permit language circulated by the agency, Ecology should consider *an evaluation and professional opinion of a licensed geotechnical engineer that concludes that soils and/or topography are suitable for any proposed infiltration of stormwater.*

Monitoring

The City of Pullman supports a permittee/stakeholder driven process for developing an Eastern WA Phase II Municipal Stormwater Permit monitoring program, such as the one currently proposed in the preliminary language related to S8.

Again, thank you for the opportunity to comment. Please feel free to contact me with any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Buchert". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Rob Buchert
Stormwater Services Program Manager
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