



**City of  
Wenatchee**

**DEPARTMENT OF PUBLIC WORKS**

Public Services Center

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June 17, 2011

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

RE: Preliminary Draft Language for Monitoring and Low Impact Development

To Whom It May Concern:

The Washington State Department of Ecology has announced that the next Eastern WA Phase II Municipal Stormwater Permit will include additional permit language addressing monitoring and low impact development. On May 16<sup>th</sup>, Ecology issued preliminary draft language for monitoring and explanatory notes regarding low impact development. Informal comments on the preliminary draft language were requested by June 17<sup>th</sup>.

Upon review of the proposed language and information presented on low impact development, city staff has the following comments:

- In the development of the Stormwater Management Manual for Eastern Washington and the Phase II Municipal Stormwater Permit, Ecology recognized that stormwater management in Eastern Washington is significantly different from Western Washington. The geography and climate even varies substantially within Eastern Washington. With regards to both monitoring and low impact development, the City would like to request that Ecology continue to recognize Eastern Washington's unique climate, hydrology and geology and that specific standards may not be applicable to all basins within the region.
- While significant progress that has been made in Eastern Washington with regards to stormwater management in the last four years, the local programs are only in the beginning stages of implementation. The City believes that these programs, including Illicit Discharge Detection and Elimination, Construction Site Stormwater Runoff Control, Post-Construction Stormwater Management and Pollution Prevention and Good Housekeeping for Municipal Operations, will all have a positive impact on water quality. To continue to implement the aforementioned programs and effectively move forward in the areas of stormwater monitoring and low impact development, the city respectfully requests that at least one permit cycle be dedicated to developing a plan for implementing low-impact development and monitoring. Some of the concerns with moving

too quickly into implementation of monitoring and low impact development are as follows:

- Implementation of stormwater monitoring programs in Western Washington and throughout the country has been very expensive and has often resulted in useless data. Stormwater monitoring requires careful advanced planning and assessment as well as an investment in equipment, skilled field technicians, and laboratory testing.
- Water quality monitoring is already being implemented in Eastern WA by various groups including Ecology, public utility districts, United States Geological Survey, and watershed organizations. These monitoring activities are currently uncoordinated and have not been evaluated for their applicability to the municipal stormwater program.
- We desire to achieve the best value for the dollars invested in our stormwater program. Identifying the problem or what our goal is for various areas in Eastern WA impacts how we should invest limited stormwater funds. As an example, our urban area is relatively small relative to the large rural watersheds that feed the Wenatchee and Columbia Rivers. Funds may be better spent developing new technologies to ensure that water quality is not further degraded as the area urbanizes with new development. Had this approach been implemented 50 years ago in the highly urbanized areas of Puget Sound, there may not be the water quality problems from stormwater that we see today.
- Stormwater utility fees are typically used to implement stormwater management programs, and using this money to fund Eastern Washington studies outside the local community may be unpopular with the citizens and the local governing body. The question has also arisen as to whether it is legal for the city to give locally-collected stormwater fees to Ecology or a consultant for an Eastern Washington stormwater monitoring program that may only be partially benefit the local community.
- Low impact development best management practices for Eastern Washington have not been developed where infiltration is not viable. Most of the best management practices being implemented in Western Washington are not applicable in Eastern Washington and more importantly not tested in the Eastern Washington climates. More importantly, not having best management practices for low impact development that have been proven puts permittees and developers in a difficult position of spending money on untested and possibly ineffective stormwater facilities. Long term maintenance and

operation of LID facilities is also a concern. We propose using this next permit cycle to develop new technology. Over the last couple of years, the City has experimented with different LID BMPs and has had marginal success. Improvements to these practices are needed.

- Because of the lack of information regarding low impact development in Eastern Washington, education and outreach to the development community is lacking and cannot be accomplished until more information is developed.
- Different definitions of low impact development appear in the Stormwater Management Manual for Eastern Washington and the current Eastern Washington Municipal Stormwater Permit. Also, the definition may change as best management practices are evaluated and developed for Eastern Washington.

The city appreciates the opportunity to provide comments. We look forward to continuing to work with Ecology and the other stakeholders to develop and implement effective stormwater management programs in Eastern Washington.

Sincerely,  
PUBLIC WORKS DEPARTMENT

A handwritten signature in blue ink, appearing to read 'Steve King', with a stylized, cursive style.

Steve King  
Public Works Director-Engineering