

From: [Kathy Humphrey](#)
To: [SW Permit Comments](#)
Subject: strengthen LID permitting
Date: Thursday, February 02, 2012 4:52:03 PM

Thank you for your work to keep stormwater runoff from polluting the Puget Sound.

I'm writing to request you further your efforts with a strong permitting system for Low Impact Development that also includes support for monitoring and enforcement. For example

- There should be more LID options discussed. More detailed requirements and incentives for cisterns, green roofs, and and water re-use are needed.
 - There needs to be clear requirements for LID to be incorporated in the very first stages of the project. As the draft permits are written, there is not much of a barrier to developers clearing large areas of vegetation and putting in large detention basins, then saying there is no room for LID.
 - Related to the above, there should be clear language about retaining native soils and vegetation, the most effective and cost-effective way to reduce stormwater runoff. The language now is that this should be done "to the maximum degree practicable" which is not specific.
 - The guidelines for rain garden feasibility should be less stringent. Rain gardens can be called infeasible in the current draft permit language, if the soil permeability is less than 0.30 " per hour. Rain gardens can be successfully installed in soils with lower permeability.

In addition, I encourage the DOE to fully fund the Stormwater Working Group and the comprehensive stormwater monitoring plan that effort produced.

Thank you,
Kathy Humphrey

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