

From: [Mark Phillips](#)
To: [SW Permit Comments](#)
Cc: [jim halliday](#)
Subject: Draft Municipal Stormwater Permit Comments
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To: Washington State Department of Ecology

Municipal Permits Comments

As co-chairs of the Lake Forest Park StreamKeepers, we appreciate the opportunity to comment on the proposed revisions to the Phase II Stormwater Permit. We are a volunteer organization of about 20 members that for the last 15 plus years has been monitoring water quality of the two salmon bearing streams in our city to help protect salmon habitat.

Our perception is that the draft revised permit is moving slowly in the right direction, but that it will not be enough to stem further deterioration of our streams and lakes. We believe the introduction of watershed-level planning and intervention is a good step, both in terms of providing a realistic context for pollution prevention, and in possibly allowing jurisdictions to leverage limited resources for a common good. We appreciate the decision to apply permit regulations to projects smaller than one acre – very important in largely built-out places like Lake Forest Park, where almost all activity is done on smaller lots. We also believe DOE's plan to assist jurisdictions with water monitoring will make it much more likely that adequate pollution monitoring will occur.

However, we feel the draft permit still falls short in the all-important area of stormwater control. Full adoption of proven green infrastructure strategies (LID) would make a tremendous difference in preventing the runoff that has been changing the chemistry of our streams, negatively affecting salmonids and the aquatic organisms on which they feed. Our streams flow into Lake Washington. If our streams are polluted, we are continuing to damage the health of the lake, which in turn continues the deterioration of Puget Sound.

Right now, the draft stormwater permit fails to fully adopt and encourage proven green infrastructure strategies that would make a big difference in preventing polluted runoff and improving the long-term health of the salmon-bearing streams, the lake, and Puget Sound.

- The draft doesn't include any measures that would prevent a developer from completely paving over existing green space. We know that this not only leads to big water pollution problems, but it increases flooding and taxpayer costs.
- The proposed permit includes too many loopholes that allow a business-as-usual approach. Green infrastructure techniques have been successfully implemented in projects across the region. To require them now would be a straightforward next step.

We urge that DOE require the development of a template that becomes part of the SEPA checklist used by lead agencies for projects to consider and disclose the downstream cumulative impacts to fish, erosion, habitat, etc., as well as require consideration of the impacts of increased transit capacity. Mitigation and impact fees should be assessed to offset those costs to the environment.

If we want to ever achieve actual results in protecting Puget Sound, we need to get moving now to develop stronger regulations to stop the onslaught of toxic stormwater into our surface waters, not some time in the future.

Thank you on behalf of Lake Forest Park StreamKeepers,

James Halliday, Co-chair, 425-442-4475

Mark Phillips, Co-chair, 206-388-7284