

**From:** [Linda Berry-Maraist](#)  
**To:** [SW Permit Comments](#)  
**Subject:** Comments on Phase II permits  
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I am submitting the following comments on the new proposed DOE stormwater permits and manual.

- The issue of whether the new manual and permit creates conflicts w/ GMA is paramount. The example that DOE used in their presentation in Poulsbo (1/2 acre residential lot w/ 65% native vegetation) is not compliant w/ GMA for urban areas. It is essential that DOE expectations for urban areas be achievable and compliant with GMA.
- Infiltration becomes more burdensome and less achievable at greater densities. GMA and PSRC Vision 2040 encourage greater density in urban areas. The DOE requirements are pushing development to lower densities and provide a financial incentive for low density development and sprawl.
- Requiring infiltration in areas where storm water drains directly to open water is a burdensome expense and expectation for virtually no environmental gain. In areas that drain to open water the focus should be water quality, not infiltration.
- Requiring infiltration in areas that are inappropriate creates a liability for all. Soil stability, impact on adjacent properties and the appropriateness of soils have to be considered.
- Requiring vegetated roofs or proving that all commercial development cannot include vegetated roofs is financially burdensome and is in conflict w/ many design standards. A maximum 20% roof is visually essentially flat, less than the slope of most mobile homes, it is not an aesthetic that DOE should mandate. Many commercial buildings in urban areas are simply not appropriate for vegetated roofs for the roof spans and structural requirements. The roof loading influences the building design at all levels, requiring every commercial project in the state to prove that a vegetated roof is unreasonable is an excessive financial burden in a time of economic difficulty.
- Studies have estimated the costs of retrofitting the existing urban areas for stormwater will cost between \$3 and 16 billion dollars. The greatest impact on the water quality of Puget Sound is stormwater runoff from existing areas, not new construction. Excessive requirements for new projects will diminish local government's financial resources to deal with the greater problem, which is improving water quality in runoff from existing areas.
- The economy is in trouble. The greatest impact has been to the construction industry. Excessive requirements for new construction creates obstacles to new construction and redevelopment in blighted areas. It will reduce jobs, slow the economic recovery and diminish taxes paid to state and local government. In urban areas the emphasis should be on effective means to improve water quality. Has science proven that it is possible to mimic predevelopment conditions in high density urban areas?
- Leadership at the highest level has said that we can't choose between the environment and our economy. The new requirements, do not focus on the highest priorities. Requiring urban hydrology mimic pre-development conditions cannot be implemented without greatly impacting the economy. We don't need expensive requirements that make very little environmental difference, in urban areas we need to focus on water quality and clean up Puget Sound.

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*Position 1*