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January 20, 2012

Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

RE: Review and Analysis of the Department of Ecology's Draft Municipal Stormwater Permit and Low Impact Development Standards

Dear Sirs:

The Pilchuck Audubon Society would like to comment on the draft for the new municipal stormwater permit and low impact development standards. Our Society represents approximately 1000 members, most of whom live in Snohomish County. One of our projects is the Willow Creek Habitat Demonstration Garden in Edmonds. The purpose of this garden is to demonstrate how homeowners can use native plants and natural land features to support wildlife habitat and enhance the environmental quality of their property. Also, we have members who have added rain gardens, pervious pavements and native plants to their yards to improve water runoff problems and wildlife habitat. Therefore, we feel a strong connection with the matter at hand.

The Sustainable Development Task Force of Snohomish has also submitted a letter with comments to you and shared their conclusions with us. After careful review of this document, we are in agreement with them. Specifically, we encourage you to make the full spectrum of LID techniques the default standard in stormwater treatment. This would include native vegetation and soil preservation/restoration, soil amending, the minimizing of impervious surfaces, green roofs, cisterns, stormwater bogs, and bio-berms. The protection and replanting of native vegetation is especially dear to us as this also provides habitat for avian life. Also, we strongly support the requirement for training people involved in implementing these techniques and the requirement for them to keep up with future developments in this evolving profession.

The Pilchuck Audubon Society strongly encourages you to strengthen your LID standards as proposed by the Sustainable Development Task Force of Snohomish. We would like to see your agency be a leader in the inevitable march towards the protection of our precious water resources.

Thank you,

A handwritten signature in black ink, appearing to read 'Mike Blackbird'.

Mike Blackbird, President
Pilchuck Audubon Society