From:	Susan Kaun
To:	SW Permit Comments; Wenger, Barry (ECY)
Subject:	Draft Municipal Stormwater Permit Comments
Date:	Thursday, February 02, 2012 11:04:23 AM
Attachments:	2004406008.pdf

TO: Department of Ecology
FROM: Susan Kaun
DATE: February 2, 2012

RE: Draft Municipal Stormwater Permit Comments

SUBJECT: Best Available Science

I spent fourteen years managing a sewer/water district, and with generous grant funding from the Department of Ecology and EPA, we planned, designed, and completed a multifaceted, award winning lake restoration project at Liberty Lake. I can attest that stormwater management was essential to the success of the project. During that time the district instituted and enforced best available science stormwater management guidelines for all new construction within the restored lake's watershed, and the district enforced Spokane County's stormwater management guidelines for new construction located over the sole source-aquifer within the district's boundaries.

In my opinion, presently the principles for best available science for stormwater management comes from the attached letter signed by fourteen Washington State scientists. The letter was written to the Puget Sound Partnership on October 26, 2006, regarding the failed practices of stormwater management, and thoroughly discrediting end-of-pipe treatment and detention. Instead, they recommended the following: PRACTICES THAT MUST BE IMPLEMENTED IF PUGET SOUND IS TO BE SAVED:

1. Preserve Existing Least-Disturbed Watersheds and Subwatersheds.
2. No Net Loss of Forest Cover in the Puget Sound Basin.
3. Halt Runoff From New Impervious Area in the Puget Sound Basin.
4. Preserve Existing and Restore Destroyed Buffer Areas Adjacent to Streams.
5. Reduce the Amount of Runoff From Existing Impervious Area.

The letter states: "All undersigned have credentials to comment on effective approaches for urban runoff management:

Douglas Beyerlein, Professional Hydrologist and Professional Engineer
Susan Bolton, PhD, Professional Engineer
Derek B. Booth, PhD, Professional Engineer and Professional Geologist
Thomas W. Holz, Professional Engineer

Thom Hooper, Fisheries Biologist
Richard R. Horner PhD, Environmental Engineering Research
James R. Karr, PhD, Ecologist
DeeAnn Kirkpatrick, Fisheries Biologist
John Lombard, Planner and Environmental Policy Analyst
Christopher W. May, PhD
Gary Minton, PhD, Professional Engineer
David R. Montgomery, PhD, Professor of Geomorphology
David Somers, Fisheries Biologist
Cleve Steward, Fisheries Biologist"

In writing the visionary Shoreline Management Act of 1971, the legislature found that 'the shorelines of the state are among the most valuable and fragile of its natural resources.' Therefore, as development occurs, in order for these most valuable and fragile of natural resources to be protected, I believe that no end-of-pipe treatment and detention should be allowed, and all new permits for stormwater management should be written with these five best available science practices in mind.

Thank you for this opportunity to comment on the Draft Municipal Stormwater Permit.

Kind regards,

Susan Kaun
613 Donovan Avenue
Bellingham WA 98225
(360) 527-9660

Attachment: 200406008 Letter to Puget Sound Partnership, October 26, 2006