

**From:** [Amy Waterman](#)  
**To:** [SW Permit Comments](#)  
**Subject:** Draft Municipal Stormwater Permit Comments  
**Date:** Friday, February 03, 2012 3:58:04 PM

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February 3, 2012

Bill More  
Washington Department of Ecology  
Water Quality Program  
PO Box 47696  
Olympia, WA 98504-7696

RE: Draft Updates to Phase I and II Western Washington Municipal Stormwater Permits

Dear Mr. Moore,

Thank you for the opportunity to comment on the Draft Municipal Stormwater Permits. These comments apply to both Phase I and Phase II permits for the 2013-2018 time period. We are writing on behalf of Sustainable Seattle, a 25 year old organization whose mission is to be a catalyst and resource for positive change. Our goals are collaboration, social justice, and stewardship. We have been involved in stormwater issues most recently through our Sustainable Rain project, which involved the installation of 5 rain gardens in businesses and organizations in Seattle. We have done sustainability interviews and public education on stormwater issues as part of this project as well, including training on how to build rain gardens. We have also been an active participant in the Green Infrastructure Partnership, organized by Seattle Public Utilities with representatives from King County, EPA, and many environmental organizations in the Seattle area. We were recently featured in a panel discussion of this group, due to our work with El Centro de la Raza, a Latino cultural center where we installed a rain garden.

We feel strongly that, beyond the legal mandates that require DOE to better manage stormwater, that it is very urgent to change "business as usual" in land development and redevelopment in order to reduce pollution to Puget Sound and give communities hope that we can make a difference in this immense problem. We don't need to give you the data; your staff have done the studies that show that between 14 and 94 million pounds of toxic pollutants enter the Sound annually. We believe we can do better.

We appreciate DOE's efforts towards better stormwater management and we realize that this is a very complicated system to monitor and regulate, due to so many interconnections between systems and municipalities. We especially applaud the requirements that projects under 1 acre of land will be regulated in Phase II jurisdictions. This will create consistency and reduce impacts from the large number of projects that fall in this size range.

Here are the ways we would like to see the permits strengthened:

- 1.) We would like to see the requirements for LID to be strengthened in several ways:

- 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. As you know, trees, especially evergreens, can soak up hundreds of gallons of stormwater a year. The language now is that retaining native soils and vegetation 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 the manual recommended in the draft permit itself, "Rain Garden Handbook for Western Washington Homeowners", soils of 0.1-0.25 " per hour are described as feasible.

2.) We applaud the Puget Sound Partnership and DOE for supporting the Stormwater Working Group and the comprehensive stormwater monitoring plan that resulted. We urge DOE to fund this effort fully. The budget laid out in the draft permit is not sufficient to make this monitoring effort successful and useful. It would be a waste of money have to collect more data that "sits on the shelf" because it is compatible with others and not usable.

Thank you for considering our comments. We look forward to following this permit process as it unfolds.

Sincerely,

Amy Waterman

Project Manager, Sustainable Rain

Terri Butler

Executive Director, Sustainable Seattle