



CITY OF EDMONDS

DAVE EARLING
MAYOR

PUBLIC WORKS DEPARTMENT • OPERATIONS & MAINTENANCE CENTER
7110 210TH STREET SOUTHWEST, EDMONDS, WA 98026
PHONE (425) 771-0235 • FAX (425) 744-6057 • WWW.EDMONDSWA.GOV

February 1, 2012

Municipal Permit Comment
Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696
(Via e-mail: SWPermitComments@ecy.wa.gov)

Subject: Comments on Draft Phase II Municipal Stormwater Permits

To Whom It May Concern:

The City of Edmonds would like to thank you for the opportunity to comment on the draft municipal stormwater permits. The City of Edmonds is committed to effective stormwater management to improve water quality in our creeks, lakes, and Puget Sound.

Draft 2012 – 2012 Western Washington Phase II Municipal Permit

- **Confusing Deadlines** – By not changing any of the text of the permit, some of the deadlines are very confusing. For example, in S5.C.5.d, the Permit states, “Inspection of all catch basins and inlets owned or operated by the Permittee at least once before the end of the permit term.” Does this mean it has to be completed between August 1, 2012 & August 1, 2013? Please clarify this question.

Draft 2013 – 2018 Western Washington Phase II Municipal Permit

- **Section S5.C.4.c.i, Page 32** – This section discusses required inspection of facilities permitted under the permit first issued by Ecology in 2007. Does this include facilities permitted from February 16, 2007, through July 31, 2012, which were below the 1-acre threshold? Please clarify this question.
- **S8 Monitoring, Pages 51-62** – Sections C, D, and E all state that Ecology will administer the collective funds and implement the monitoring programs in accordance with agreements between Ecology and each Permittee. Municipalities must pass this cost onto their rate payers by increasing fees. If Ecology gives grants to municipalities, Ecology should deduct the monitoring costs from future grants, rather than asking Permittees to raise fees to pay for monitoring. This will save administrative costs at both ends.

- **Appendix 1 – Section 3.1, Page 8** – The text states that the thresholds in section 3.2 (New Development) and 3.3 (Redevelopment) are to be used at the time of application for a “subdivision, plat, or a short plat.” Do these thresholds apply to a new development on single parcel (not part of a subdivision, plat, or short plat) or an addition to an existing residence on a single parcel site? If so, the text should be changed to “parcel, subdivision, plat, or a short plat.”
- **Appendix 1 – Section 4.5, Pages 25-26 and Section 8, Pages 37-38** – Mandatory List #1 for on-site stormwater management best management practices and the associated feasibility criteria are long and will be very burdensome to homeowners and developers on small sites. In addition, it will be very burdensome for municipalities to evaluate and document all the criteria and competing needs.

In an urban, mostly built-out City like Edmonds, the majority of the activity is redevelopment of small sites. For these “small sites” the default choices for all hard surfaces should be pre-sized rain gardens (based on impervious area draining to it). These rain gardens should be “feasible” unless steep slopes or underground issues restrict their placement. Rain gardens can be used in most soil types, if an overflow is provided. The lists in the draft Permit can remain, but as options to the developer.

Should you have any questions or comments, please contact Jerry Shuster, P.E., Stormwater Engineering Program Manager at 425-771-0220 x1323 or shuster@ci.edmonds.wa.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Williams". The signature is fluid and cursive, with a large initial "P" and "W".

Phil Williams
Public Works and Utilities Director

cc: Rob English P.E., City Engineer
Jerry Shuster P.E., Stormwater Engineering Program Manager
Tod Moles, Street/Stormwater Manager
Jeanie McConnell, Engineering Program Manager