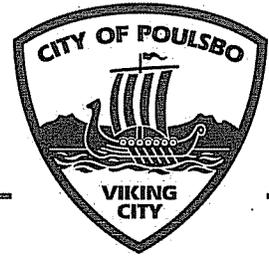


City of Poulsbo

Public Works Engineering Division



February 2, 2012

DEPARTMENT OF ECOLOGY

FEB 06 2012

WATER QUALITY PROGRAM

Ms. Harriet Beale
Municipal Stormwater Permit Comments
Washington State Department of Ecology
Water Quality Program
P.O. Box 47696
Olympia, WA 98504-7696

RE: Phase II Draft Permit Language

Dear Ms Beale:

The City of Poulsbo would like to thank you for the opportunity to comment on the draft language for the draft permit and manual.

We also appreciate the Department of Ecology coming to Poulsbo and presenting a workshop on the draft permit and manual to help us understand the changes that are being proposed to the permit and manual, as well as help explain what the Department of Ecology is intending to accomplish with these changes. We would however, like to request that the comment period be extended beyond the current cut-off date of February 3, 2012. As you are well aware, all communities, especially the smaller Phase II communities, are working with very reduced staffing and have very little staff time available for review of these documents. We would also like to point out that coming to our community on January 30th and then expecting quality comments on the Friday of that same week is not conducive to us being able to provide high quality and comprehensive comments. The changes proposed are wide ranging, the documents very large and technical, and the implications of the changes proposed are very broad. We would like very much to have the time to allow staff to perform a proper and more thorough review of the documents, prepare presentations to our City Council so that the Council can become aware of the proposed changes and their broad implications. This will allow our Council to formulate a position and provide you with an official response from the elected officials of our community.

We would also like to point out that we feel that concurrent review of the draft permit, draft manual and draft LID manual all at the same time is very difficult, and the fact that all of the documents are interrelated to a great degree further complicates review of the documents. These complicating factors greatly increase the staff time necessary for a comprehensive and high quality review of the documents.

200 NE Moe St ♦ Poulsbo, Washington 98370

(360) 779-4078 ♦ fax (360) 697-8269

www.cityofpoulsbo.com ♦ andre@cityofpoulsbo.com

General Comments:

Expansion of Scope:

We feel that the current draft permit goes well beyond what is required by both the Clean Water Act and the Puget Sound Pollution Control Hearings Board decision and is well beyond what is appropriate. Expanding into the areas of vesting and requiring comprehensive review and changes to other land use codes is, in our opinion, not appropriate for stormwater regulation. Additionally, the financial and manpower costs associated with the requirements proposed appear to be virtually unattainable for Phase II communities.

Testing and Monitoring:

The level and extent of both testing and inspection/monitoring being proposed is virtually unattainable for Phase II communities. We feel that the level of inspection and monitoring being required is setting up communities for failure. We also feel that the level of testing being required for design of projects will increase the costs of project design for both municipal and private development projects to the point that they will be unaffordable.

Requirement of LID:

The City has been a supporter and driver of LID construction techniques and has many successful municipal projects constructed incorporating LID techniques, but we do not feel that mandating LID in all construction is an appropriate approach to success. Rather we feel that it will cause LID to be implemented in inappropriate locations and virtually guarantee failures, which will increase resistance to LID techniques among the local development community and slow the progress of LID implementation where it might have been appropriate and successful. It should also be pointed out that Poulsbo like many other communities in Kitsap County is mostly sited on glacial till soils not suited to management of stormwater with LID techniques. Requiring LID stormwater management measures instead of encouraging their creative use in those areas *where possible* we feel further increases the chances for failure, subsequently slowing the implementation of LID stormwater management techniques where they are more possible and appropriate.

Removal of 1 acre threshold:

We understand the desire to bring those communities that currently do not at all regulate projects under one acre up to some level of regulation for those properties. However, we do not feel that enforcing the full measure of the 2005 or 2012 stormwater manual is appropriate. Rather, we feel that the current approach taken by the City of Poulsbo to regulate those under one acre properties under the 1992 DOE manual, and over one acre properties with the 2005 DOE manual is a better approach. Poulsbo has a huge number of small properties that were developed long before stormwater regulation and currently have no quality and no quantity control for stormwater leaving the site. These sites are virtually guaranteed to not redevelop if the full measure of either the 2005 manual or the proposed 2012 manual is imposed upon them. We feel that by regulating those properties under a slightly relaxed but still very good set of regulations will encourage those properties to redevelop and bring both a water quality and quantity benefit that would not otherwise be realized. At a minimum we feel that redevelopment of those under 1 acre properties should be held to a lesser standard if not all properties under the one acre threshold.

Green Roof Requirement:

We feel that the requirement for green roofs being proposed is completely unreasonable and should be entirely removed.

Lack of Experience:

We would like to point out that we have only reviewed one single project under the current adopted permit and manual and do not have enough experience yet with implementation of the existing regulations to be able to consider adding additional new requirements. That single project was not even reviewed at the detail level, as it is a conceptual stormwater plan at the Master Plan level. Further detailed review of stormwater plans will be required for each phase of that project. During that review we have discovered many issues that are not easy to resolve (and/or are not yet resolved) related to issues with infiltration galleries and utilities among other issues. We have discovered that while we would prefer to not allow utilities in or through infiltration galleries at all, due to utility design and placement limitations in many cases it is unavoidable for utilities to either run through or cross infiltration galleries. This brings up many issues, including but not limited to INI issues and issues with separation between water and sewer utilities, not to mention maintainability of those same utilities.

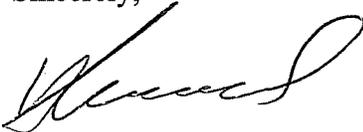
Pervious drive aisles for municipal streets

These draft documents would appear to require the use of pervious pavements for non-arterial municipal streets in most cases. In addition to the above mentioned unresolved issues with utility conflicts (noting that we much prefer our utilities to be sited within our roadway prisms for many reasons), the long term costs of these pavements are as yet completely untested. It appears from early experience with pervious pavements that they have greatly reduced lifespans compared to conventional pavements. In further appears that long term maintenance costs will be greatly increased as well. At a time that communities are struggling with and/or failing to properly maintain their existing roadway network we feel that the additional financial and manpower burdens being imposed by the required usage of pervious pavements in municipal drive aisles are not attainable by Phase II communities.

We do not consider these comments to be comprehensive or complete at this time. We will continue to review the permit and associated manuals and will endeavor to provide further comments on the broad implications of these proposed changes in as timely a fashion as possible.

Thank you again for the opportunity to provide comments on the draft language, we look forward to working with you to help in the goal of drafting more appropriate and attainable language for the permit and manual(s).

Sincerely,



Andrzej Kasiniak, P.E., City Engineer
City of Poulsbo

