

April 29, 2009
Attn: Ms. Harriet Beale
Municipal Permit Comments
WA Department of Ecology Water Quality Program
P.O. Box 47696
Olympia, WA 98504-7696

**SUBJECT: City of Bothell: Surface Water Management Program
Comments on Ecology's Proposed Modifications to the
WESTERN WASHINGTON PHASE II MUNICIPAL STORMWATER PERMIT**

Dear Ms. Beale,

Thank you for the opportunity to comment on the March 2009 proposed modifications to the Western Washington Phase II Municipal Stormwater Permit.

Bothell's Surface Water Management (SWM) Program has the following comments for the proposed permit modifications. Note: the following comments are in response to other recently previewed Phase II permit holder's submitted comments. The comments here offer an alternative view to the requested delay in implementation and adoption of Section S5.C.4 Controlling Runoff from New Development, Redevelopment and Construction Sites.

The City of Bothell is geographically located at the bottom of several watersheds and frequently receives excessive storm water runoff and related polluted discharges. The SWM staff and other city departments must routinely respond to incidents of poor water quality and floods which originate, in part, upstream within other Phase I and II permit jurisdictions. It is recommended that all upstream contributing jurisdictions act sooner than later to improve the quality and quantity of runoff that flows through the City of Bothell. It is in the interest of all our citizen's Health, Safety, and Welfare that all permit holders improve rather than delay treatment of our number 1 pollution source to Puget Sound, storm water runoff.

The delay may lead to further vesting using current inadequate storm water control design standards. The outcome of a delay most likely will have a significant negative impact to our water's and citizen's health here in Bothell and throughout Puget Sound.

The City of Bothell anticipates meeting the current permit deadlines found in S5.C.4. While anything can happen between now and August 15, 2009, the City's adoption of the 2005 WDOE manual is on track to be completed by August 15, 2009.

Bothell concurs with Ecology's proposal to provide several months between the ordinance adoption date and ordinance effective date.

Sincerely,

Andy Loch
Surface/Storm Water Coordinator

CC: Gary Sund, Utilities Supervisor City of Bothell
Janet Geer, Surface/Storm Water Coordinator City of Bothell
Kristin Terpstra, Environmental Engineer City of Bothell

