

City of
Bellevue



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February 3, 2012

Stormwater Management Manual Comments
Ms. Carrie Graul
Water Quality Program
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

Subject: Draft 2012 Ecology Stormwater Management Manual for Western Washington

Dear Ms. Graul,

Thank you for the opportunity to comment on the Washington State Department of Ecology's draft 2012 Stormwater Management Manual for Western Washington (draft Manual). The City of Bellevue (City) appreciates the significant challenges in developing the new draft Manual and commends Ecology staff on the work they have done to date.

The City supports the goal of the federal and state water quality acts to provide clean water and recognizes the role that municipal stormwater management plays in reaching that goal. Cities have been leading the way in investing in fighting stormwater pollution, and we appreciate Ecology's recognition that municipal permittees' stormwater investments under the current NPDES Permit (2007 Permit), including the current 2005 Ecology Manual, are delivering results.

The City has serious concerns about the draft Manual and the associated public review process. We support strong and effective stormwater management and believe that our recommendations on the draft Manual and public review process will allow Bellevue and others to better assist Ecology in developing a more effective Manual that cities can reasonably implement and communities can afford.

The City of Bellevue has 3 primary areas of concern with the draft Manual:

- A. Ecology's public review process;
- B. New low impact development (LID) stormwater best management practices (BMPs) requirements; and
- C. Other new significant Manual requirements.

The City commented on the first two of the three primary areas of concern in a February 3, 2012 comment letter to Ecology on the draft NPDES (2013-2018) Western Washington Phase II Municipal Stormwater Permit. These comments and recommendations also apply to the draft Manual and are excerpted in Attachment 1.

Comments on other new significant Manual requirements are in Attachment 2.

In closing, please be aware that these comments are preliminary in nature and that Bellevue does not waive any comments or concerns not otherwise included in this letter.

Thank you for your consideration of these comments. If you would like to discuss these comments, please contact Phyllis Varner, NPDES Permit Manager, at 425-452-7683 or pvarner@bellevuewa.gov.

Sincerely,



Nav Otal
Director
Bellevue Utilities

Attachments enclosed

cc: Coalition of Phase II municipalities