



February 2, 2012

Harriet Beale
Washington Department of Ecology
Water Quality Program
P.O. Box 47696
Olympia, WA 98504-7696

RE: City of Longview Comments – Draft Stormwater Management Manual for Western Washington

Dear Ms. Beale:

We appreciate Ecology's efforts to update to the Stormwater Management Manual for Western Washington (SMMWW) and would appreciate your consideration of our following comments:

Timeline

The City of Longview requests more time to review these changes – many of which are vast in scope. Most of the available staff time was spent studying the draft Phase II permit and the PSP LID Manual which were up for review concurrently.

Volume I, Section 2.5.2, p.2-22 – MR#2: Construction Stormwater Pollution Prevention (SWPP)

Change the wording of Element #5 (Stabilize Soils) from:

“Depending on the geographic location of the project, soils must not remain exposed and unworked for more than the time periods set forth below to prevent erosion:

- *During the dry season (May 1 - Sept. 30): 7 days*
- *During the wet season (October 1 - April 30): 2 days”*

to the following simpler, stricter standard (because it lacks a 2-7 day lag before cover is required) :

“Depending on the geographic location of the project, soils must not remain exposed to any measureable precipitation event.”

This continues to be one the most contentious erosion control issues in the field. The current criteria are inflexible and very often wasteful because topography, other BMPs, and favorable weather frequently obviate the need for cover within the 2 or 7 day timeframes. Contractors resent inspectors who enforce this requirement when their costly cover is graded over after doing nothing for a couple days all under blue skies.

Volume II, Section 2.2, p. 2-7: Construction Stormwater Pollution Prevention Plans

Delete the second bullet, which requires a SWPPP if “The construction project is located in a municipality covered under [a Phase I & II] Municipal Stormwater Permit.”

This change to require a SWPPP for every project inside the City is a staggering over-reach and will create mayhem at the local level.

Adding insult to injury, the SMMWW (Vol. II, Sections 3.2.1 and 3.2.2) goes far beyond what is required by the Construction Stormwater General Permit at larger sites.

Volume II, BMP C-121: Mulching, p. 4-24

- Remove the following statement in Table 4.1.8: “Straw should be used only if mulches with long-term benefits are unavailable locally.” Straw is one of the most widely used mulches even when others with long-term benefits are available locally. Typically these other mulches are much more expensive and many mulched areas using straw eventually are converted to impervious surfaces anyway.
- Also, the design and installation specifications now require a 2” minimum mulch thickness regardless of the type of mulch used. Please clarify this, so it does not apply to hydromulch. Most hydromulch service providers probably could not achieve that thick standard. Ongoing assessment and maintenance of BMPs already ensures the effectiveness of erosion controls. Please remove this universal 2” minimum mulch thickness requirement.

Volume III, Section 3.3.5, p. 3-73: Site Characterization Criteria

Eliminate the requirement for most projects to monitor groundwater through a wet season prior to design submittal. This is an expensive request that will immediately and substantially retard the pace of development. There is not a one-size fits-all solution to every design.

We thank Ecology for the opportunity to comment on the draft Stormwater Management Manual of Western Washington. We look forward to cooperation with Ecology to protect surface water in a way that is both affordable and effective. Feel free to contact me at 360 442-5299 or steve.warner@ci.longview.wa.us.



Steve Warner
Stormwater Inspector
City of Longview

cc. Jeff Cameron, PE, Public Works Director
Bob Gregory, PE, City Manager
Josh Johnson, PE, Street/Stormwater Manager