



**City of Seattle**  
Seattle Public Utilities

February 3, 2012

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

**Subject: Stormwater Management Manual for Western Washington Comments**

Dear Ms. Graul:

The City of Seattle appreciates the opportunity to provide these comments to the Department of Ecology regarding the draft Stormwater Management Manual for Western Washington for 2012. As the largest municipality in Washington State, Seattle understands the importance of its role in stormwater management and is committed to improving the health of receiving waters by continuing to reduce the impacts of stormwater runoff. We are proud of our comprehensive stormwater program and supportive of changes to permit requirements that increase our effectiveness in managing stormwater impacts. We feel that it is important for all jurisdictions to step up and take appropriate actions to control stormwater runoff, and thank the Department of Ecology for their leadership on this issue.

We recognize that developing new requirements and guidance for LID is an important and complex undertaking, in part because of the range of conditions found in Western Washington and also because of the limited experience that jurisdictions have with LID regulation. Seattle is eager to continue to support Ecology's work in developing effective LID requirements and guidance and have provided comments here that are based on our experience in a highly developed urban environment.

We recognize Ecology's efforts thus far to develop the draft requirements and guidance for (LID) techniques in the Manual. We understand that additional revisions will be forthcoming and since the draft was incomplete, it was difficult for Seattle to provide an adequate review of the document. Therefore, we request that Ecology provide an additional comment period for the Manual prior to the issuance of the 2013NPDES Municipal Stormwater permit.

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We are providing three attachments that include our comments on the Manual and maintenance standards for bioretention and permeable pavement. Seattle suggests that all LID BMPs be combined into one volume of the Manual and not be divided between Volumes III and V. This change would provide more clarity to the user, especially when a project is required to meet Minimum #5, but is not required to meet Minimum Requirements #6 & #7. In addition to the comments in the attachments, Seattle has also provided Ecology, separately, with comments on the draft 2013NPDES Municipal Stormwater Permit. Comments provided about Appendix 1 of the Permit are also intended to apply correspondingly to the Manual.

Thank you for your consideration of Seattle's comments and for your efforts to develop effective requirements to protect our environment. If you have any questions or require further information, please contact Sherell Ehlers ([Sherell.Ehlers@Seattle.gov](mailto:Sherell.Ehlers@Seattle.gov) or 206-386-4576). We look forward to continuing to work with you.

Sincerely,



Bruce Bachen, Director  
Drainage & Wastewater Quality Division  
Utility System Management Branch  
Seattle Public Utilities

Attachments:           SMMWW – Seattle Comments  
                              Seattle Bioretention Maintenance Standards  
                              Seattle Permeable Pavement Maintenance Standards

Cc:     Ray Hoffman, Director, Seattle Public Utilities  
          Diane Sugimura, Director, Seattle Department of Planning and Development  
          Peter Hahn, Director, Seattle Department of Transportation  
          Nancy Ahern, Deputy Director, Seattle Public Utilities  
          Martin Baker, Deputy Director, Seattle Public Utilities  
          Tracy Tackett, P.E., Green Stormwater Advisor, Seattle Public Utilities  
          Sherell Ehlers, P.E., Stormwater Policy Advisor, Seattle Public Utilities  
          Kevin Buckley, NPDES Permit Coordinator, Seattle Public Utilities  
          Theresa Wagner, Assistant City Attorney, Seattle City Attorney's Office