Dear Gentlepersons,

I would like to submit the following limited comments with respect to the proposed revisions to the "Stormwater Management Manual for Western Washington". While I am a new resident to the State of Washington, I have had some experience with both stormwater issues and property development. In the short time I have lived on Puget Sound, I have come to appreciate it's unique character and the energy and efforts that go into protecting this wonderful resource. While I applaud the work that has taken place to modify your existing management plan, I will limit my comments to those provisions that deal with Low Impact Development (LID) and land use and development.

First I would like to say that in my experience carefully planned development is not only critical to our communities continued growth but to the well being of our growing population. There is a fundamental bias on the part of developers to remain competitive with their counterparts in other parts of the affected developmental area as well as other jurisdictions. By implementing a Stormwater Management Manual that is the starting point for development throughout the Western Washington watershed and allowing local jurisdictions to only implement more stringent, not less stringent requirements, a level playing field is provided for developers. A critical component of development planning is knowing the rules. Once the rules have been established development will continue on an even keel.

While the Stormwater Management Manual is only guidance, there will likely be a tendency for many regulatory agencies to treat it's provisions as either law or regulation. Since that will be the case, I would ask that you consider stakeholder education and the implementation of a repository of developmental alternatives. Training can be provided by either the State or qualified educational institutions. It is important that anyone reviewing permit applications relating to LID be well trained in alternatives and the implementation of LID. Education should also be afforded to the regulated public. While I am not convinced that there should be a certification requirement, if one is imposed, it should be easily accessible. The State may also want to consider something similar to the U.S. EPA's RCRA Hotline to answer questions especially during the first couple of years of implementation.

The development of LID requirements and the incorporation of LID technologies into the Stormwater Management Manual is critically important to the continued protection of your watershed. As our knowledge of the environment and its interrelationship of our daily activites has developed, we have had to consider how and what we will regulate. Someone once said that "Progress is systematically unbalancing the environment". That balancing act falls on both the regulators and the regulated community. It must be a partnership that considers new and developing technologies. Low Impact Development represents one of those technologies.
Based on our current knowledge it should be the first choice or default option for all stormwater treatment. Because of the varied geology and current development of Western Washington, however, a flexible approach is needed in the review of development applications which may also incorporate other alternative management methods. Careful consideration should be given protection of native vegetation on sites and the minimizing of impervious surfaces. Consideration should also be given to promoting water reuse where appropriate.

Thank you for considering my comments and your work in protecting the Western Washington watershed.

Respectfully

Richard Paulen