

## **Ballard Stormwater Consortium**

### **Comments on Draft Directors' Rules for Seattle Municipal Codes, Chapters 22.800-22.808, Stormwater Code**

December 31, 2012

Thank you for this opportunity to provide comments on the December 5<sup>th</sup> Draft Directors' Rules establishing Requirements for Green Stormwater Infrastructure to the Maximum Extent Feasible for Single-Family and Residential Parcel-Based Projects (Seattle Municipal Code, Chapters 22.800 22.808, Stormwater Code, Director's Rule: DWW 201.1 (SPU)/15.2012(DPD)).

I am submitting comments on behalf of the Ballard Stormwater Consortium (BSC). We are a committee of Ballard residents who are concerned about the impacts of stormwater and combined stormwater/sewer systems upon Salmon Bay and Puget Sound. The Ballard Stormwater Consortium formed in the wake of Seattle Public Utilities' (SPU's) unsuccessful attempt to use roadside raingardens to infiltrate stormwater to reduce combined stormwater and sewage overflows in the Ballard neighborhood of Seattle, Washington. We are working to promote technically sound, environmentally effective and cost-effective solutions in addressing the problems of stormwater surges causing raw sewage to be released into both Shilshole and Salmon Bays which are part of the Puget Sound ecosystem.

We have reviewed the Draft Director's Rule establishing Green Stormwater Infrastructure requirements for Residential and Parcel Based Projects. We have evaluated the proposed requirements based on our experience with the unsuccessful effort to apply infiltration-based green infrastructure projects in our Ballard neighborhood.

#### **General Comments**

1. The Ballard Stormwater Consortium (BSC) supports the use of Green Stormwater Infrastructure (GSI) where such projects are technically feasible, recognizing that they can work in some places but will not work everywhere. Members of BSC have had recent experiences with curbside rain gardens. This infiltration-based technology did not work in our neighborhood. Based upon this experience, BSC believes GSI techniques and technologies should be recognized and used only where they can be demonstrated to be feasible, and that the tests done to determine whether a site or sites are appropriate should always be done with Best Management Practices (BMPs). Green infrastructure should only be used when soil and infiltration rates allow appropriate drainage. This should be clearly stated in the Directors' Rule and should be reflected throughout it.

## General Comments continued

2. The Directors Rule should only apply to new Single-Family residential construction projects, in that the construction is done from the ground up. This appears to be what is defined in Appendix D. It should be clearly stated throughout the document. We are not supportive of having these requirements apply to “any” or “all” residential projects.

## Specific Comments

1. Align the statements about the application of these rules with the definition of Single-family residential Projects in Appendix D of the draft rule. Places that need to be fixed include:
  - **Chapter 1 – Introduction, page 3**, which currently states “Any Single-family Residential Project.”
  - **Chapter 2 – GSI to MEF Rule, page 4**, which currently states “All Single-Family residential projects”
2. State clearly that Green Stormwater Infrastructure should only be used when soil and infiltration rates allow appropriate drainage and incorporate this information in the sections of the Directors’ Rule listed below:
  - **Chapter 5- Evaluating Feasibility: Physical Constraints, page 8**, which currently does not mention soil and drainage conditions.

Add a paragraph that states the GSI stormwater projects should only be used when soil and infiltration rates allow for appropriate drainage. It is important to make this statement and to clearly state this constraint given the widespread presence of glacial till soils and high groundwater/water tables. It would be helpful if the Directors of SPU and DPD supplement this rule with links to soil maps and groundwater information.
  - **Appendix C: Infiltration Feasibility Flowchart, page C-1**, Consider adding a step in the flow chart to enter information about the soil type, prior to doing the PIT test. Consider providing a checklist like those provided on the RainWise website and in Rain Garden resource books.

Thank you for considering our comments.

Sincerely,

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