Erika Dinsmore

For Ecology's consideration, the following comments on the Preliminary Draft 2019 SWMMWW are provided:

• Provide modeling guidance for athletic fields. Both a simplified approach and recommendation for an alternate explicitly modeled approach for athletic fields with underdrains would be appreciated. For example, in the 2016 King County Surface Water Design Manual, grass cover with underdrains can be modeled as 50% grass/50% impervious. Surface Water Design Manual, Table 3.2.2.B: "For purposes of runoff modeling, underdrained pervious areas may be modeled explicitly to account for attenuation and infiltration, or may be modeled as 50% impervious/50% grass where either: (a) there is no added liner, (b) where the added liner is a treatment liner, or (c) where the added liner is one that does not restrict infiltration rates below the in situ soil infiltration rate." Similar guidance would provide clarity to designers and local jurisdictions.

• Provide clear language and guidance on requirements to demonstrate infiltration infeasibility/limited infiltration. Is an exploratory infiltration pit in the winter months always necessary? It seems the intent of testing during winter months is to demonstrate that you can infiltrate at your design rate when soils are saturated, groundwater elevations tend to be higher, and more extreme precipitation events occur. If infiltration is already very limited during summer months, then requiring further testing during winter months seems unnecessary. Also, please provide clear guidance if a soil analysis and/or geotechnical opinion is sufficient. Please provide guidance for infiltration suitability/feasibility for fill soils.

-Erika Dinsmore, Project Engineer, AHBL