

CITY OF EDMONDS

121 5TH AVENUE NORTH · EDMONDS, WA 98020 · 425-771-0220 · FAX 425-672-5750
Website: www.edmondswa.gov

DAVE EARLING
MAYOR

PUBLIC WORKS DEPARTMENT

Engineering Division

January 31, 2019

Foroozan Labib
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504

RE: DRAFT WSDOT Municipal Stormwater Permit

To Whom It May Concern,

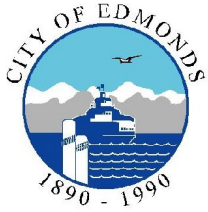
We thank you for the opportunity to comment on the proposed WSDOT Municipal Stormwater Permit. The City of Edmonds applauds the effort to align this permit with the Phase 1 & Phase 2 permits and would encourage any further revisions to this affect.

We only wish to suggest one improvement to Section S5.C.7.c (maintenance of catch basins and inlets). We request that said section be revised with additional language to include ‘culvert pipes’ as a feature subject to the requirements of this section, namely annual inspection.

We believe some of WSDOT’s most environmentally sensitive areas are the culverts which drain creeks or other potential aquatic habitats underneath the barriers created by roadways. It is also well known that WSDOT has recently been ordered to correct those culverts which are known fish barriers. However, it is not clear in our experience that WSDOT’s maintenance activities, as it relates to culvert pipes and watercourses, has been sufficient to protect aquatic habitat and ensure fish passage at culverts which did not present a barrier when well maintained. A recent records request turned up zero maintenance records for the previous 10-years for a WSDOT maintained culvert within our jurisdiction.

Furthermore, we believe these water courses are typically large in nature, carrying significant flows which, when not well maintained, can create large flooding events in a very short amount of time or divert creek flows to areas not intended for fish passage. Such flooding events not only impact aquatic habitat by way of additional erosion, pollutant loading, and fish stranding, but can also have large impacts on human property, safety, and well-being.

Accordingly, we believe this section should be revised to clearly include “culvert pipes” as a feature to be maintained under the provisions of Section S5.C.7.c. Alternatively, a definition of “inlet” which clarifies that it includes any location where runoff enters a piped system, regardless of formal structure type, would also meet the intent.



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Additionally, we have reviewed the *Highway Runoff Manual* referenced in the permit document and did not find a section specifically addressing culvert maintenance or watercourse maintenance. We believe the suggested permit revision must be accompanied by a required revision to the runoff manual to further define WSDOT's approach to meeting this requirement.

Thank you for your time and your consideration.

Sincerely,

Zachary Richardson, P.E.
Stormwater Engineer, City of Edmonds