

**2006 Officers**  
**President**  
Katherine Claeys, PE  
Light Rail Project Engineer  
City of Seattle  
PO Box 34996  
Seattle, WA 98124-4996  
(206) 684-8175  
Fax (206) 684-3238  
katherine.claeys@seattle.gov

**Vice President**  
**Dave Mandyke**  
Deputy Director-PW & Utilities  
City of Spokane  
808 W Spokane Falls Blvd  
Spokane, WA 99201  
(509) 625-6320  
Fax (509) 625-6274  
dmandyke@spokanecity.org

**Secretary**  
**Mike Terrell, PE**  
Construction Engineering Manager  
City of Seattle  
Seattle Public Utilities  
Seattle Municipal Tower  
PO Box 34018  
Seattle, WA 98124-4018  
(206) 684-3078  
Fax (206) 684-8581  
michael.terrell@seattle.gov

**Treasurer**  
**Kristina B. Nelson, PE**  
Construction Division Manager  
City of Tacoma  
747 Market St, #620  
Department of Public Works  
Tacoma, WA 98402-3701  
(253) 591-5787  
Fax (253) 594-7966  
knelson@cityoftacoma.org

**Past President**  
**Dick McKinley**  
Director of Public Works  
City of Bellingham  
210 Lottie St  
Bellingham, WA 98225  
(360) 676-6961  
Fax (360) 676-6894  
rmckinley@cob.org

**Board of Directors**  
**Term 2005-06**  
**John Akers, PE**  
Director of Public Works  
City of Ellensburg  
414 North Main St  
Ellensburg, WA 98926-3112  
(509) 962-7101  
Fax (509) 962-7127  
akersj@ci.ellensburg.wa.us

**John M. (Mike) Cowles**  
Manager Utilities Section  
HNTB I-405 Project  
600-108th Ave NE, Suite 405  
Bellevue, WA 98004  
(425) 456-8619  
Fax (425) 456-8600

**Jill M. Marilley, PE**  
City Engineer  
City of Shoreline  
17544 Midvale Ave N  
Shoreline, WA 98133  
(206) 546-8887  
jmarilley@ci.shoreline.wa.us

**Patricia A. Thomson, PE**  
Project Manager  
City of Bellevue  
301 116th Ave SE  
PO Box 90012  
Bellevue, WA 98009-9012  
(425) 452-6014  
Fax (425) 452-7695  
TAThompson@ci.bellevue.wa.us

**Board of Directors**  
**Term 2006-07**  
**Randy Brackett, PE**  
Asst. County Engineer  
Island County  
PO Box 5000  
Coupeville, WA 98239-5000  
(360) 679-7331  
Fax (360) 678-4550  
randyb@co.island.wa.us

# American Public Works Association

## Washington State Chapter

50 Years



November 29, 2006

Governor Christine Gregoire  
Office of the Governor  
P.O. Box 40900  
Olympia, WA 98504-0900

Subject: Puget Sound Partnership Recommendations for Stormwater

Dear Governor Gregoire:

This letter is written on behalf of the American Public Works Association (Washington Chapter) Stormwater Managers Committee to provide comments on the recent recommendations of the Puget Sound Partnership. Our committee met on November 17<sup>th</sup>. The agenda included discussion of the recent comment letter addressed to the Puget Sound Partnership and signed by 14 individuals engaged in science related to stormwater management in the Puget Sound Region. The Stormwater Managers Committee agrees with the scientists' letter but wants to add several key points listed below for your attention and for inclusion in the Puget Sound Partnership's plans.

The APWA Stormwater Managers Committee has been in place for over 18 years as a forum for public and private sector stormwater managers to meet and discuss evolving stormwater management requirements, lessons learned in managing stormwater, and to promote sharing of technical information to advance the collective knowledge among stormwater management practitioners in the state of Washington. The committee's membership includes a wide range of city and county officials, regulatory agency staff, and consultants from around the state that are actively involved in managing stormwater quality and quantity in urban areas. The committee meetings are held 6 to 12 times per year and typically attended by 30 to 40 people, all of whom are actively involved in current stormwater management issues of concern to the region. Much of the committee's focus has been on issues that are relevant to the health of Puget Sound. Since its formation, the committee has played a key role as a sounding board for emerging policies and

**Peter (Pete) Capell, PE**  
Public Works Dir./County  
Engr.  
Clark County  
PO Box 9810  
Vancouver, WA 98666  
(360) 397-6118 ext. 4071  
Fax (360) 397-6051  
peter.capell@clark.wa.gov

**Harold E. (Hal) Thomas, PE**  
Director of Public Works  
City of Walla Walla  
15 North 3rd, PO Box 478  
Walla Walla, WA 99362  
(509) 527-4463  
Fax (509) 525-0845  
hthomas@ci.walla-walla.wa.us

**Gary L. Phillips, PE**  
Project Manager  
Berger/Abam Engineers  
33301 Ninth Ave S  
Federal Way, WA 98003  
(206) 431-2300  
Fax (206) 431-2250  
phillips@abam.com

**Chapter Liaison**  
**John W. Carpita, PE**  
MRSC  
Public Works Consultant  
2601 Fourth Ave, Suite 800  
Seattle, WA 98121-1280  
(206) 625-1300  
Fax (206) 625-1220  
jcarpita@mrsc.org

**Chapter Delegate**  
**Craig Olson, PE**  
Capital Budget Asst.  
to the Governor  
Office of Financial Mgmt.  
PO Box 43113  
Olympia, WA 98504-3113  
(360) 902-0531  
Craig.Olson@ofm.wa.gov



technical initiatives brought forth by the Department of Ecology and the Puget Sound Action Team.

The November 17th Stormwater Managers Committee meeting included 20 attendees employed by local and state agencies and 11 employed by private firms, all engaged in stormwater management. There was agreement that the Puget Sound Partnership plan does not adequately address stormwater. The key points that we want to emphasize are:

1. **Land use decisions determine impacts.** Once land is converted from forest to impervious surfaces, stormwater managers can only partially mitigate impacts. The Growth Management Act and required local land use planning is not strong enough on its own to protect our water resources as even low density rural residential development can lead to significant declines in water quality and fish habitat. Local and State agencies need the State to clarify the extent of their legal authority to regulate development to address water quality and habitat in the context of property rights and land use vesting.
2. **Any plan must aggressively address existing development.** The observed degradation of Puget Sound is the result of existing developed land and land uses. Further regulation of new development is critically important but will not protect or restore Puget Sound – it will only slow the decline. Addressing the adverse effects of existing development should include an ambitious timetable as redevelopment has historically occurred at only 1%-2% per year.
3. **Local, State and Federal governments must address the sources of toxic pollutants.** Certain pollutants are highly toxic and cannot be eliminated cost-effectively by known stormwater management technology. Examples include:
  - dissolved zinc from tires, and building materials;
  - dissolved copper from building materials, herbicides and automobiles;
  - pesticides,
  - phthalates from plastic containers and cosmetics, and
  - Polybrominated diphenyl ethers (PBDEs) used in flame retardants.

The only fully effective way to address these pollutants and others like them is to prevent their exposure to stormwater. This can be accomplished by prohibiting them or requiring a deposit on plastic containers to encourage collection and recycling. Local agencies can

regulate building materials but cannot effectively regulate consumer products. The State should work with the Federal government to eliminate these toxic products. In the absence of Federal action, the State could work with Oregon and California to prohibit many pollutants such as zinc in tires.

4. **Very large amounts of money will be needed to treat runoff from existing developed areas and to protect habitat.** Providing flow control and treatment of runoff from existing development and acquiring and restoring habitat will be expensive. Although expensive, it is essential to restore Puget Sound. The level of funding needed will be beyond the ability of local jurisdictions to pay and will require significant state and federal support.

These points were all made clear at the Partnership workshop May 15th at the University of Washington and at previous stormwater stakeholder processes.

In response to the 14 scientists' letter, there has been discussion of forming a group of stormwater scientists and managers to improve the Partnership's recommendations related stormwater. The APWA Stormwater Managers Committee is well positioned to perform a significant role in any upcoming partnership effort to address stormwater management in the Puget Sound basin and we respectfully, but emphatically, request that you include us. We see little added value in creating yet another broad stakeholder group to address stormwater.

Thank you for your leadership in restoring Puget Sound. Your leadership is courageous, refreshing and inspiring.

Sincerely,



William E. Derry  
Co-Chair Stormwater Managers Committee,  
American Public Works Association, Washington State Chapter

c: Jay Manning  
Billy Frank  
Brad Ack  
Kathy Fletcher