



PUGET  
SOUNDKEEPER®



WASHINGTON  
ENVIRONMENTAL  
COUNCIL

May 29, 2019

Rich Hoey  
Public Works Director  
PO Box 1967  
Olympia, WA 98507

**Re: Nature's Scorecard Update (Municipal Stormwater LID Permit Requirements)**

Dear Mr. Hoey,

Beginning in 2012, cities and counties covered by the Western Washington Phase I and II Municipal Stormwater Permits were required to update their development codes and regulations to make low impact development (LID) principles and practices the "preferred and commonly used approach" by the end of 2016. To track whether cities and counties were complying with these requirements, Puget Soundkeeper (Soundkeeper) and Washington Environmental Council (WEC) created Nature's Scorecard.

Nature's Scorecard is a first-of-its-kind tool for holding Puget Sound cities and counties accountable for implementing the LID requirements under the Municipal Stormwater Permits. Since 2016, Soundkeeper and WEC have worked together to review the municipal codes for all 83 Phase I and II permittees to assess their compliance with the LID code update requirements outlined in the 2012-2018 Permits.

Specific considerations for the Scorecard included: (1) assembly of an interdepartmental review team; (2) facilitation of an accessible public review and code adoption process; (3) implementation of proposed LID code updates; and (4) filing of form 41b with an annual report to Ecology, including a clear matrix of code updates. Additionally, we selected five specific LID code updates - chosen directly from the LID Code Update and Integration Toolkit - to examine in detail for each permittee. For each of these fundamental code updates, which we believe were straightforward, easy to accomplish, and vital to achieving the goals of the Permits, we awarded a checkmark to any municipality that implemented the necessary changes. We also communicated these scores to the public via the *Scorecard*.

When we first released *Nature's Scorecard* in December 2017, over half of Puget Sound cities and counties were missing the mark. Now, after continued advocacy and outreach from our members, as well as the hard work of public works and community development staff across the region, 72% of cities and counties have earned at least 4 of 5 checkmarks as we reach the close of the current permit cycle. We are especially proud of our four new Green Star Cities: Bellingham, Lynden, Monroe, and Puyallup. Enclosed please find an updated and final version of Nature's Scorecard, which documents this significant progress. For more information, please visit our updated website at [www.naturesscorecard.com](http://www.naturesscorecard.com).

Stormwater is the biggest source of toxic pollution to Puget Sound. Studies by Department of Ecology show that 75% of the toxic chemicals entering Puget Sound are carried by stormwater runoff that flows off of hard urban surfaces and into our waterways. To protect our region's salmon, orca, and community health, we must reduce toxic stormwater pollution. LID is one of the most effective ways to reduce this pollution. Because our region is already heavily built-out in many areas, we must also begin the process of retrofitting developed areas.

Our future depends on fixing mistakes of the past by retrofitting existing development to better manage stormwater and prevent pollution. We look forward to working with Puget Sound municipalities on the upcoming permit requirements, which will focus on the need to plan for and, in some cases, implement these retrofits. Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Thank you,

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