



June 16, 2011

Washington State Department of Ecology
Christina Maginnis
Water Quality Program
Bellingham Field Office
1440 10th Street
Suite 102
Bellingham, WA 98225

Re: NPDES Municipal Permit Comments

Dear Christina,

The City of Burlington has met phase II municipal stormwater permit requirements partly due to grants from Department of Ecology (DOE). Approximately \$75,000 has been allocated annually to all phase II communities during the first permit cycle. If this funding is eliminated, it will be difficult for small cities like Burlington to meet current permit requirements, and impossible to meet proposed new permit requirements. Without financial assistance, future code updates will be difficult to achieve. We request this “pass-through” grant funding is continued and not become competitive. It is hard for small towns to be competitive with large cities, and compete for stormwater grant funding. Previous “pass-through” grant funding was allocated to small cities based on population. This funding program is imperative.

As for new monitoring requirements in the proposed permit, it is not feasible for Burlington to pay approximately \$20k per year for a stormwater group out of town to handle the monitoring tasks. At this time, we agree with the Association of Washington Cities comment that this monitoring requirement should be handled by DOE and paid for by the State. If monitoring is required, we request that DOE allow phase II communities an option to do this on their own.

Sincerely,

Brian Dempsey, P.E.
Assistant City Engineer