CITY OF EAST WENATCHEE

PUBLIC WORKS DEPARTMENT

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June 17, 2011

Municipal Stormwater Permit Comments
Washington State Department of Ecology
Water Quality Program
P.O. Box 47696
Olympia, WA 98504-7696

RE: Preliminary Draft Language for NPDES Low Impact Development and Monitoring

The City of East Wenatchee appreciates the opportunity to comment on the Eastern Washington Phase II Municipal Stormwater Permit, preliminary draft language. However, City Staff have found it difficult to provide constructive comments when the Department of Ecology have not clearly conveyed important permit language and new requirements that would allow us to more accurately evaluate the administrative and financial impacts to the City, constituents and building community. The City of East Wenatchee values the objective of our NPDES permit and has made great progress in achieving these goals but the proposed draft language is too large of an issue and has too many impacts to be rushed through in order to meet Ecology's timeline.

The Environmental Protection Agency has delegated authority to the Department of Ecology to administer the Clean Water Act. An Eastern Washington regional approach to NPDES Monitoring and Low Impact Development, lead by local jurisdictions and stakeholders, is too large of a permit requirement to grasp without clear draft language, baseline water quality data and financial analysis. The City finds it appropriate to employ Engrossed Substitute House Bill 1478, continue working under current permit requirements and allow Ecology to establish a process that would have more beneficial results for all involved.

Preliminary Draft Language and Comments

Monitoring

Page 2 – 'The intent of the S8 preliminary draft language below is to provide a default minimum-level-of-effort ambient monitoring program that will answer the question, "Are receiving waters getting better or worse?", and also fund some effectiveness studies.?'

The "minimum-level-of-effort" for monitoring and effectiveness of the permit should be associated with the results directly related to the implementation of the six core elements within our Stormwater Management Program created for compliance with the current Eastern Washington Phase II Municipal Stormater Permit cycle. As required, local jurisdictions have proposed various means of evaluating the effectiveness of the implemented stormwater management programs. These recommendations were submitted to Ecology. For the Wenatchee Valley, the proposed monitoring measures included target stormwater program effectiveness which could consist of the following questions:

1. How many charity car wash events were conducted in compliance with local regulations using the charity car wash kits?
2. How much sediment/debris was removed during the last year from catch basins?
3. Does the implementation of construction site best management practices reduce operations and maintenance expenses for local jurisdictions?
4. How many automotive businesses implemented stormwater BMP's in the last year?

Monitoring our existing Stormwater Management Program and current NPDES Permit requirements provides greater benefit to our utility rate payers while still evaluating effectiveness of the NPDES Permit. Results from implementation of our Stormwater Management Program seem far more beneficial than initiating a regional ambient monitoring program before goals and objectives have been identified.

The City recommends that the accepted Stormwater Monitoring Plan submitted to Ecology be implemented during the second round of the permit. While Eastern Washington communities monitor the effectiveness of the current permit cycle and Stormwater Programs, Ecology should engage and lead an Eastern Washington stakeholder group to work through the development of an appropriate monitoring program. The following are some elements to consider;

1. Utilizes existing resources for sampling
2. Collecting baseline data and setting parameters
3. Quality assurance for sampling & identifying qualified staff for sampling & testing
4. Consider regions or communities in Eastern Washington
5. Establish program funding
6. Meeting expectations of the local jurisdictions utility rate payers

Low Impact Development

The concept and principle behind Low Impact Development are very innovative and can be very beneficial for the environment but it must be understood that the term LID is very broad and climate specific. The City is concerned that an LID requirement for new and re-development projects, prior to approved concepts, designs and standards may create problematic designs, higher maintenance cost and ineffective treatment of stormwater. The City supports the development of an Eastern Washington LID Manual but believes including LID as a development requirement may be premature within the next permit cycle.

Thank you for this opportunity to provide comments on the Eastern Washington Phase II Municipal Stormwater Permit, preliminary draft language. I hope these comments assist Ecology with the development of new permit language.

Sincerely,

Steven C. Lacy, Mayor

CC: Donald McGahuey, P.E.
Brandon Mauseth