



## **Anacortes Planning & Community Development Dept.**

Permit Center

P.O. Box 547, Anacortes, WA 98221-0547

PH (360) 293-1901

Ryan Larsen, Planning, Community and Economic Development Director FAX (360) 293-1938

Don Measamer, Assistant Director, Building Official

### **Comments on Draft Western Washington Phase II Municipal Stormwater Permit**

The City of Anacortes would like to thank you for the opportunity to provide comment on the draft municipal stormwater permits. The City of Anacortes is committed to providing a high level of storm water services to its residents, while protecting the natural environment.

The city has reviewed the draft Western Washington Phase II Municipal Stormwater permit and has the following comments.

#### **1. Economic Impacts**

- Comment: The City of Anacortes is concerned that mandatory LID requirements will have a significant adverse impact on small businesses and developers and in turn an adverse impact to the city. It is the cities opinion that a small business impact analysis needs to be completed to identify potential impacts prior to implementing LID requirements.

#### **2. Page 34-S5C.4g.i Review and Revisions to local development related codes, rules, standards to incorporate and require LID standards and BMPs.**

- Comment: These tasks will represent a huge undertaking across several city departments and impacting many chapters and sections of the Municipal code. Revisions to development regulations will include public meetings, public comment, city council approval and all this with limited staff. The due date should be moved out to 2017 to allow appropriate time for public participation at the city level.

3. Page 29 – S5.C.4.a Vesting Language

- Comment: Please provide clear vesting language to address projects whose applications are under review and deemed complete prior to the deadline. Vesting language should correspond with state law and current rulings.

4. Page 32 – S5.C.4.c Inspection of stormwater facilities, BMPs, catch basins every six months until 90 percent of the lots are constructed.

- Comment: A 90 percent threshold is too high a standard. A six lot short plat may sit with little to no construction for many years. This language should be changed to reflect during the period of residential construction.

5. Page 37 – S5.C.5.d Inspections of all catch basins and inlets every two years.

- Comment: The inspection frequency should remain at 5 years. Given the proposed inspection requirements and reporting requirements, and various code revisions needed at least one FTE will need to be assigned. Given the economy most jurisdictions are on very limited budgets which would not allow for hiring on an additional employee.

Again, thank you for the opportunity to comment on the draft permit and if you have any questions please feel free to contact me at 360.293.1901.

Sincerely,

City of Anacortes  
Don Measamer, Assistant Director  
Planning, Community and Economic Development