



February 3, 2012

Municipal Stormwater Permit Comments
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

RE: Comments on the proposed Eastern Washington Phase II Municipal Stormwater Permit Revisions

Thank you for the opportunity to comment on the proposed revisions to the Eastern Washington Phase II Municipal Stormwater Permit. While we appreciate the effort that Ecology has made over the last few months to engage and work with Eastern WA jurisdictions, significant changes to the draft permit language are necessary to find a balance between prudent environmental stewardship and a crippling lack of resources at the local agency level. The proposed revisions add considerable burden with little or no return on investment during a time of extreme fiscal challenge for every jurisdiction in the State.

In addition to our involvement and support of the review comments put forward by Spokane County we would like to highlight the following general statements:

Outreach (Social Engineering)

Kennewick has provided outreach under the current permit and will continue to partner with our adjacent Cities and County to continue this effort. However, developing and distributing flyers and informational material takes time and energy. Additional effort to create new material and conduct social engineering is outside of our current staffing capability and may not even be appropriate use of public funds under its draft formulation. We recommend removing any increases and updates of this nature from the current draft. We also recommend the Department of Ecology lead the effort in developing informational material.

Monitoring

We now have a program that is fully implemented, but like most Cities, we are stretched to a breaking point on manpower. The changes in the draft would require more manpower with specific technical skills. In order to afford this, we would need to raise fees to the citizens again. Now is not the time to raise the bar on monitoring. We recommend the Department of Ecology remove all statements regarding increased monitoring.

PUBLIC WORKS

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O&M Plan

We need time to fully realize the benefit of our current O&M Plan. This is another component of the draft changes to the permit that are too much too soon. We recommend removing changes associated with O&M.

Policies and Ordinances

Updates to the ordinances and procedures take a great deal of effort for our single, part time, Stormwater Manager and the City Attorney's Office. As all staff has been reduced, additional changes would create a great burden on our staff and take away the precious time we have to manage our current program.

Annual Reporting

There are multiple sections of the permit that discuss reporting. If there is to be reporting as a part of the permit, it should follow the Federal requirements (initial, year 2, year 4). The draft revisions use confusing language which makes it appear as though there will be more than one kind of report and that both of them are required every year. If the Department of Ecology insists on annual reports, we recommend simply calling them, "Annual Reports". Changing names and creating acronyms is confusing and adds additional work to revise what is currently a function set of City and State processes and ordinances.

Cross Coordination

Inter / Intra staff coordination is, for the most part, already in place. The Phase II Permittees and supporting agencies understand what they need to do. Additions to the level of detail required to report and update in an official capacity equates to work which is counter to the completing real stormwater projects.

In conclusion, the City of Kennewick is not in a position to increase effort in any area of the budget. Updates to the ordinances, programs, and procedures take a great deal of effort on the part of our single, part time, Stormwater Manager, his four person field crew, and the City Attorney's Office. As all City Departments have been reduced, additional time-consuming changes would create a great burden on our staff and significantly take away from the precious time we have to manage our current program. We recommend rejecting the majority of the new and changed language in the current draft as discussed in the detail discussion by Spokane County and as previously discussed in the letter sent to you by the Association of Washington Cities.

We again appreciate the opportunity to comment on the proposed revisions at this time. With the current challenges that the State and all local jurisdictions are fighting with regards to budget, we feel it is the wrong time to propose new and costly permitting requirements that exceed those required by the EPA. We would appreciate the time to better determine the capabilities of our of our current Stormwater Management Program

Sincerely,



For Peter Beaudry
Public Works Director

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