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Harriet Beale
Washington State Department of Ecology
P.O. Box 47696
Olympia, WA 98504-7696

RE: Draft Phase II Municipal Stormwater General Permit Comments

Dear Ms. Beale:

We would like to thank you and the Department of Ecology for the opportunity to comment on the draft 2013 – 2018 Western Washington Phase II Municipal Stormwater Permit, the draft 2012 Stormwater Management Manual for Western Washington and supporting documents. The City of Mount Vernon supports protecting our valuable water resources and has policies and programs in place to achieve that goal. Our comments regarding the new draft permit generally fall into two main categories; those regarding the public review process and those regarding new regulatory requirements affecting City of Mount Vernon citizens and businesses.

The draft Permit and its Appendices, all five volumes of the State Stormwater Manual and other supporting regulatory documents comprise a large volume of complex, highly technical information. Typically, Ecology would have conducted a separate public review process on the draft Manual before imbedding the final standards in the draft NPDES Permit as proposed requirements. In this case, Ecology did not do so, which provides entirely insufficient time for review by local jurisdictions.

The City of Mount Vernon urges Ecology to extend the existing Municipal Stormwater Permit already being implemented. The recently required and implemented measures of that existing Permit will continue to provide Clean Water Act protections so that that Ecology can extend the review process and also change the effective date of the new Permit to early 2015.

New requirements on public and private development projects, including the new mandates for Low Impact Development principles and measures, may conflict with other mandates, state laws and local government authority to regulate land use. The new requirements add significant stormwater management costs for Mount Vernon residents and businesses at a time when resources are scarce due to the bad economy.

Ecology should provide appropriate technical and cost-benefit analyses of the new Permit requirements, including those for development and redevelopment. Ecology should also conduct separate, consecutive public review processes for the draft Manual, draft Permit and supporting documents.

The City of Mount Vernon would like to thank Ecology for considering these comments in its development of the Western Washington Phase II Municipal Stormwater Permit.

Enclosed you will find more detailed comments and recommendations on the draft Permit, Manual and supporting documents.

Sincerely,



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cc: Esco Bell, PE, Public Works Director
Kevin Rogerson, City Attorney
Jana Hansen, Community and Economic Development Director
Claudia Oates, Development Review Engineering Manager