



November 14, 2018

Abbey Stockwell
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

Dear Ms. Stockwell:

The City greatly appreciates the opportunity to comment on the Washington State Department of Ecology's proposed update to the National Pollutant Discharge Elimination System Phase II Permit Update and 2019 Stormwater Management Manual. The City would like to thank you for taking the time to ensure there was associated outreach to the Port Angeles area in the form of a presentation to City Council and the Informational Training Session held in Port Angeles on November 5, 2018.

City staff spent hundreds of hours reviewing the draft documents and find the proposed changes would have a substantial impact to our operations, stormwater utility, and overall community. Unfortunately, insufficient time was provided for comment for us to do a complete review of both documents. Additional time would be necessary to truly assess the impact of these changes. So first, the City asks that you please recognize that this proposed revision to the Permit adds significant and burdensome new requirements, programs, and reporting. All these would have a major impact on Port Angeles. We have not had adequate time to fully review and analyze all of these impacts. Please allow additional time for review and comment.

The City understands and shares the overarching goal of this stormwater permit to protect the environment. The policy direction established by the City Council is that the City shall do all it can to be an environmental steward with the responsibility ensuring clean stormwater and the elimination of pollutants reaching the Port Angeles Harbor, Strait of Juan de Fuca, and greater Puget Sound. Over recent years we have invested tens of millions of dollars that came directly from our citizens to ensure environmentally sound outcomes are reached for all of these water bodies. However, the City feels strongly that solutions to environmental problems cannot be a one-size-fits-all approach. The unique characteristics of our community require a more customized approach that takes into account local soil type, economic conditions, social challenges, and the millions of local dollars we already have spent on new infrastructure that

has produce a significant, direct, and measurable benefit to the water quality in Port Angeles harbor.

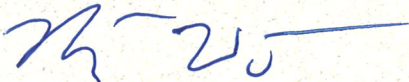
As a community, we cannot afford to take on a disproportionate share of responsibility. On multiple occasions we have asked Ecology to work in the direction of provided greater recognition of our unique local characteristics and challenged local economy which requires building in more flexible options for the Permit and Manual. Instead, what we see in the drafted documents and Ecology presentations is a move in the direction of a one standard approach for all of Western Washington.

Port Angeles is a relatively small community that is suffering from economic adversity. It does not and cannot function like other jurisdictions on the I-5 corridor. Our tax base is arguably the most limited in income and capability of any Phase II jurisdiction and our utility rate payers are already at a point of not being able to afford existing utility costs. As you will see in our attached comments, the cost associated with the new permit requirements are disproportionately excessive in comparison to the size of our current stormwater program. Those added costs will force utility rate increases that our citizens cannot afford.

The Permit further places challenges on Port Angeles relative to the lack of recognition on the importance of infill development. Multiple sections appear to add confusion or create conflict regarding to Growth Management Act responsibilities. Port Angeles no longer has available large tracts of subdividable land and must rely on the efficient development/redevelopment of smaller infill lots. The permit must allow the economic feasibility of local engineers and contractors to design and develop these lots with flexibility that also allows for housing development to resolve our local housing crisis.

Again, I appreciate that Ecology provided the comment opportunity. However, the implications to our local jurisdiction are of enormous impact to community. For all of these reasons, the City urges Ecology to not implement the Permit that currently is out for comment. Rather, we urge you to revise the proposed Permit. Revise the proposed Permit to build more flexibility into both the permit and the manual that recognize the unique environmental, economic, and social needs of smaller communities such as ours.

Sincerely,



Nathan A. West
City Manager

CC: Sally Toteff, Regional Director Department of Ecology
Senator Kevin Van De Wege
Representative Steve Tharinger
Representative Mike Chapman
City Council