

River Plan / North Reach
Planning Commission Worksession
Responses to comments on the Proposed Draft
February 24, 2009

TOPIC: Stormwater

1. BRIEF SUMMARY OF COMMENTS ON THE TOPIC:

The majority of these comments are from the DEQ's Water Quality program and are good reminders that the River Plan / North Reach document should include more information related to water quality, stormwater, and TMDL issues. In many cases we have agreed to include more information in the document. Some of the comments ask for more detail on the City's stormwater program than is appropriate to include in the River Plan / North Reach document, so we have referenced other City stormwater management documents and permits.

2. STAFF-PROPOSED AMENDMENTS IN RESPONSE TO COMMENTS

a. Amendments for Discussion with Planning Commission

No amendments are proposed that staff believes Planning Commission needs to discuss.

b. Minor Amendments

No minor amendments are proposed.

c. Technical Amendments

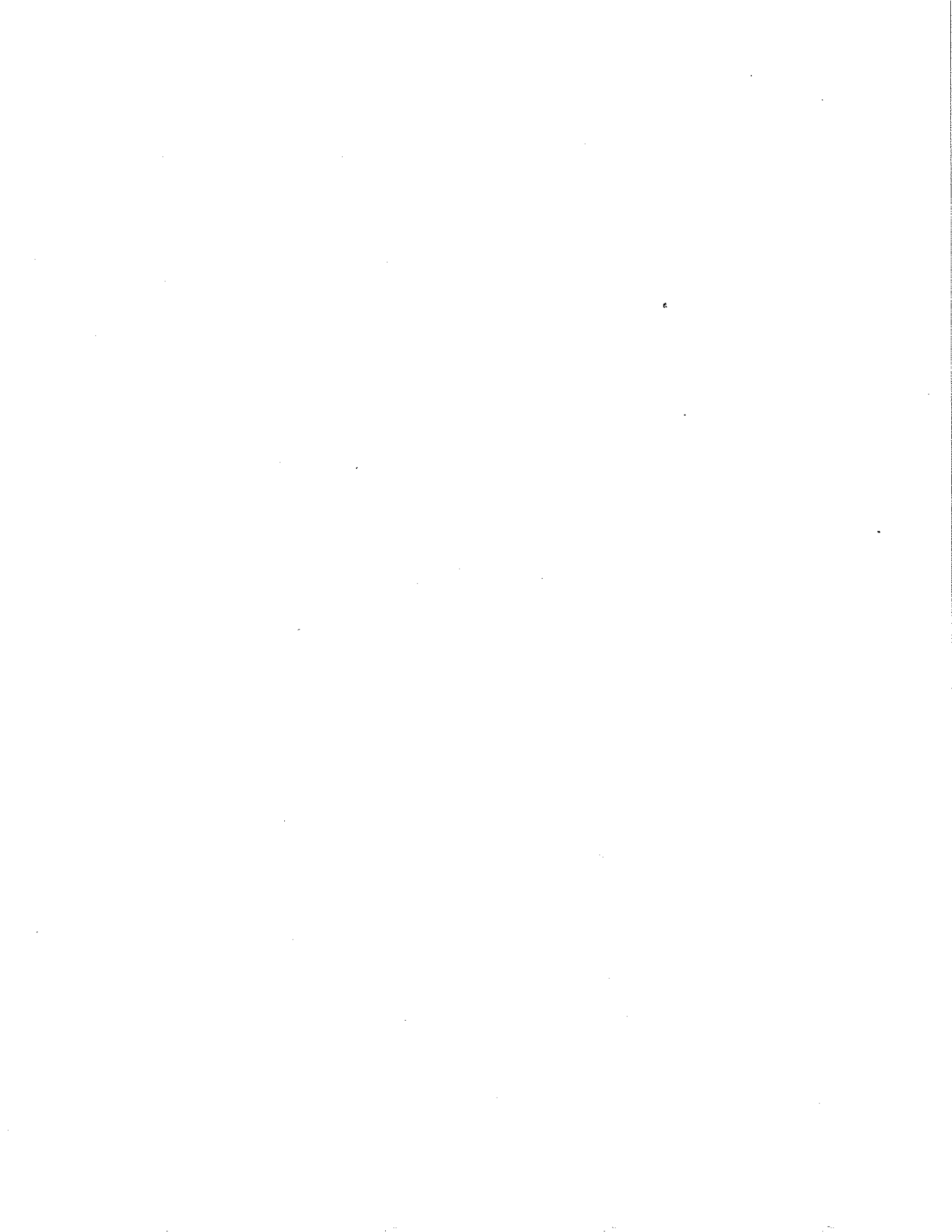
Comments and responses are attached. Technical amendments are included in the staff response section of each comment.

3. COMMENTS THAT DO NOT REQUIRE AMENDMENTS

Comments and responses are attached.



2. c. PUBLIC COMMENTS RELATED TO TECHNICAL AMENDMENTS



Report of River Plan Comments

Topic 1: Stormwater Topic 2: All Topic 3: All Comment Type: Editorial/technical edit
Comment ID: All Staff Entered: All Commentor: All Hearing Date: All
Geo Area: All Volume: All Document Edited?: All Individual Review: All
Staff Assigned: All Comment Addressed?: All

Topic 1: Stormwater

Comment ID:	163	Commentor:	Bureau of Development Services
Comment:	There is not mention of the Clean Water Act related to the TMDL/Stormwater permitting issues in the North Reach as part of the city's mandates they must comply with.		
Response:	Thank you. We'll add that to the next draft.		
Comment ID:	164	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	Again no TMDL/water quality issues discussed under "State and Regional" issues. A significant commitment in the form of a TMDL Implementation Plan, which has a large stormwater effort identified in this reach, should at least be called out as part of the plan.		
Response:	Thank you. We will add that reference to the next draft.		
Comment ID:	168	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	DEQ questions the use of the term "Inspire" industrial Low Impact Development. The next set of MS4/1200 permits will expect more than inspiration for industrial stormwater. The City may want to have a more robust program described than what the plan outlines here.		
Response:	New development is subject to more than just inspiration and will be required to comply with the Stormwater Management Manual. Staff will amend the document to make that clear. In general, the City includes ample detail on a variety of educational and regulatory programs in our City Stormwater Management program and in our Superfund documents. The River Plan document is not intended to contain that level of detail on stormwater issues.		
Comment ID:	178	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	The City may want to point out that an important type of stormwater pollution comes from exposed materials and not just impervious surfaces. Examples include fertilizer and pesticide runoff from vegetated areas, including lawns; also industrial materials and waste piles that are exposed to storm water.		
Response:	Thank you for your comment. We will add this reference to the document.		

Comment ID:	192	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	Many utilities and important conduits are depicted on the map. However, storm sewers and industrial outfalls are not depicted. Maybe it's too much detail to include the piping, but at least noting outfall locations could provide useful information. (Storm water outfalls are included on the Inventory Maps.)		
Response:	The location of the outfalls is not relevant on Map 3 or 4 because the purpose of those maps is to show information related to economic development. However, outfall locations will be added to Map #5, which shows existing condition of natural resources.		
Comment ID:	200	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	Section 1.e is pretty brief. There is little discussion of State or City involvements. For example, the City of Portland is DEQ's Agent for many areas of storm water regulation, overseeing NPDES industrial storm water permits. The MS-4 storm water permit is also not described here.		
Response:	Additional information about NPDES and stormwater permits will be added to the ESEE analysis section 1.e.		

3. PUBLIC COMMENTS THAT DO NOT REQUIRE AMENDMENTS

Report of River Plan Comments

Topic 1: Stormwater Topic 2: All Topic 3: All Comment Type: No edit required
Comment ID: All Staff Entered: All Commentor: All Hearing Date: All
Geo Area: All Volume: All Document Edited?: All TOC Section: All
Staff Assigned: All Comment Addressed?: All Individual Review: All

Topic 1: Stormwater

Comment ID:	18	Commentor:	Friends of Baltimore Woods
Comment:	Located between the neighborhood [Cathedral Park] and the river, the Baltimore Woods can store and filter stormwater from the neighborhood, improving watershed health in the North Reach, a stated goal of the City. In the future the Friends hope to work with the City to develop new opportunities for stormwater mediation.		
Response:	The Friends of Baltimore Woods should communicate with the Bureau of Environmental Services' stormwater program about stormwater management options for this area.		
Comment ID:	187	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	Regarding storm water quality, are there MS-4 and other City storm water studies that can provide indicators to measure source control improvements in the quality of storm water?		
Response:	The Municipal Stormwater Permit has two program elements that could be considered as indicators to show control of pollution sources: routine real monitoring of outfalls and instream samples and modeled benchmarks. More detail on these program elements is available in the stormwater permit documents. The City will be continuing with both elements over the long term and can show trends as an indicator. The Superfund program is also coordinating closely with DEQ on monitoring of specific industrial discharges to demonstrate a reduction of pollutant loading to the City's storm system.		
Comment ID:	194	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	Does Option A include drywells? If so, to what extent are drywells being used, or will be used? Were any other design flows considered in modeling--such as a 25-year design storm, or others? Specifically, are storm water volumes predicted to increase to the Columbia Slough, and if so by how much?		
Response:	The study focused on the capacity and deficiencies of the City's stormwater system, to identify potential public improvements to support economic development. It didn't look at the availability drywells or outfalls as an alternative to disposal into the city system.		

