

February 1, 2019

Mayor Randy Agnew City of Rock Island PO Box 99 Rock Island, WA 98850

Re: Draft Rock Island Waterfront Sub Area Plan

Dear Mayor Agnew:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for Rock Island Waterfront Sub Area Plan. We have reviewed the documents and have the following comments.

TOXICS CLEAN-UP

The facility addressed in this proposal is on Ecology's Hazardous Site List,

- Ecology Facility/Site ID #370; TCP Cleanup Site ID #4418. The Site is ranked 5.
- Ecology Facility/Site ID #369; TCP Cleanup Site ID #4718. The Site is ranked 4.
- Ecology Facility/Site ID #813; TCP Cleanup Site ID #11. The Site is ranked 4.

Hazardous substances may be present at the site in amounts and/or concentrations likely to affect human health or the environment. Site cleanup may be required in the future by Ecology under the Model Toxics Control Act. Site characterization and/or cleanup may be desirable prior to site alteration or development.

If you have any questions or would like to respond to these Toxics Clean-up comments, please contact **Valerie Bound** at (509) 454-7886 or email at valerie.bound@ecy.wa.gov.

WATER QUALITY

Erosion control measures must be in place prior to <u>any</u> clearing, grading, or construction. These control measures must be effective to prevent soil from being carried by stormwater runoff into stormwater drains that may discharged directly to surface water. Sand, silt, and soil will damage aquatic habitat and are considered pollutants.

NPDES Construction Stormwater Permit may be required if a subsequent individual or common plan of development that has potential for stormwater discharge from a construction site with disturbed ground. Ground disturbance includes all utility placements and building or upgrading

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existing roads. The process requires developing a stormwater pollution prevention plan, submitting an application and a 30 day public notice process. This may take 45-60 days. A permit and a stormwater plan are required prior to beginning ground-breaking activities. Please contact **Wendy Neet** with the Department of Ecology, (509) 454-7277, with questions about this permit.

<u>Draft Waterfront Subarea Plan</u>, p. 26, Capital Improvements Projects List, Table 3, Utilities: Sanitary sewer anticipates the need for approximately 8,000 feet of gravity main, 4,000 feet of force main and two lift stations.

<u>Upgrades of the POTW (Treatment Plant and Collection System)</u> to accommodate this development will require:

- An update of the existing General Sewer Plan (GSP). Chapter 173-240 WAC (More immediate priority)
 - 1. Review and approval of the GSP.
 - 2. Review and approval of Plans and Specifications.
 - 3. NPDES Construction Stormwater General Permit Notice of Intent (NOI) (to regulate stormwater discharges resulting from construction of collection system upgrades).

If you have any questions or would like to respond to these Water Quality comments, please contact **James Leier** at (509) 457-7124.

Sincerely,

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Environmental Review Coordinator

Central Regional Office

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