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November 15, 2011

Ms. Christe Alwin, Environmental Quality Analyst
Michigan Dept. Of Environmental Quality
Water Resources Division – Lansing District Office
525 W. Allegan St., 4th Floor-North
P.O. Box 30242
Lansing, MI 48909

Re: “Re-submittal” of Stormwater Pollution Prevention Initiative Document

Dear Ms. Alwin:

Based upon various discussions with you, the City of Lansing is aware that the “rescinding” of NPDES Permit No. MIG610000, issued May 22, 2008, has resulted in the ability of MS4 communities to propose revised requirements in their Stormwater Pollution Prevention Initiative (SWPPI) document. These proposed revisions would be approvable for program requirements where the now “in-effect” permit (i.e., NPDES Permit No. MIG619000, issued Dec. 5, 2002) lacked specificity or contained less stringent requirements.

Consistent with other Greater Lansing Regional Committee (GLRC) communities, the City of Lansing is generally committed to continuing efforts toward achieving the goals laid out in our previously submitted SWPPI. However, the City is proposing revisions to one aspect of the SWPPI and its “six minimum measures”. Specifically, we are proposing a couple of changes to the requirements for post-construction stormwater runoff control for new development and redevelopment projects.

The associated revisions are contained in Chapter 4 (see pages 19 and 20) of the attached revised SWPPI document. The primary revision is the intent to incorporate a less stringent design standard for the minimum treatment volume that would be applied to new development and redevelopment projects. It’s our understanding that several other communities are also pursuing use of a design standard less stringent than the minimum treatment volume standard of “one inch of runoff from the entire site”, which was required by the now rescinded permit.

In addition, we have, at your direction, deleted any reference to the term “alternative” and/or “alternatives” as related to the concept of stormwater “offsets” used for achieving post-construction stormwater runoff controls. At the Sept. 29, 2011, GLRC meeting, you explained

the DEQ's position on this subject; that the now in-effect permit does not preclude use of an alternative approach, such as offsets, so it's not necessary or appropriate to seek use of an alternative approach via the SWPPI. Consequently, we have deleted this reference to "alternative(s)" from the SWPPI.

We hope that these SWPPI revisions are deemed to be consistent with program requirements. If you have any questions, please contact me.

Sincerely,



Alec Malvetis
Assistant City Engineer

Cc: Chad A. Gamble, P.E., Director of Public Service
D. Dean Johnson, P.E. City Engineer