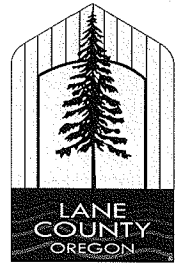


July 27, 2011

**City of Florence**  
**ATTN: Sandra Belson**  
**Community Development Department**  
**250 Highway 101**  
**Florence, OR 97439**



LAND MANAGEMENT DIVISION  
[http://www.LaneCounty.org/PW\\_LMD/](http://www.LaneCounty.org/PW_LMD/)

**RE: Florence Stormwater Management amendments**

Thank you for the opportunity to comment on the proposal for amendments to the City of Florence Comprehensive Plan, Stormwater Management Plan, and Florence City Code in regard to stormwater management.

Lane County is working with the City of Florence to create consistency in their Comprehensive Plan with Statewide Planning Goals, and to help implement the improvement and protection measures for the Siuslaw Watershed through the Siuslaw Estuary Partnership as contemplated by the Florence Stormwater Design Manual.

As with all jurisdictions in these difficult economic times the County is concerned with funding issues. Specifically in regard to the proposed changes the County wants to ensure that there are no financial implications for the County with implementation of the proposed plan policy changes. Specifically in regard to proposed Chapter 11, Utilities and Facilities, Page XI-5, Stormwater Management, Policy 11 (a-j), and Policy 24, the County has initial concerns that the public awareness program and development of regulations and administration of those regulations will have cost implications to the County that have not been anticipated.

Other specific concerns have to do with how "toxic substances" will be defined in subsection (h) of the above referenced policy 11, how provision (i) may overlap DEQ regulations, and who will administer these regulations.

Lastly, the County has identified a concern with removal of Policy 1, "The city shall encourage on-site retention of stormwater..." It appears that the closest replacement policy is number 16, "Development shall mitigate all project impervious surfaces through retention and on-site infiltration to the maximum extent practicable..." The concern is that the proposed amendments seem likely to impact County right of way when stormwater from adjacent properties overflow onto County facilities. On this policy we request that the policy language would be modified to reflect prohibition of stormwater drainage onto County right of way consistent with Lane Manual 15.515.

We appreciate your consideration of these comments and request. Please feel free to contact me if you have any questions concerning this letter at 541-682-4541 or via email at [mark.rust@co.lane.or.us](mailto:mark.rust@co.lane.or.us).

Sincerely,

Mark Rust, AICP  
Associate Planner