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November 30, 2018

Mayor Tim Keller
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87102

Subject: Proposed reduction in General Obligation bond amounts for the Department of Municipal Development storm drainage program

Dear Mayor Keller:

The Water Protection Advisory Board (WPAB) is made up of citizen advisors appointed by the City of Albuquerque (City) Council, Bernalillo County (County) Board of Commissioners, and the Albuquerque Bernalillo County Water Utility Authority Board (Water Authority). The purpose of the WPAB is to advise those entities of concerns and make recommendations regarding protection of both groundwater and surface water resources. As the interagency advisory board established by joint ordinances to oversee protection of water quality, WPAB is concerned about the proposed significant reduction in the City's 2019-2020 allocation of General Obligation funds to the Department of Municipal Development (DMD) storm drainage program.

Specifically, these budget cuts will reduce the City's ability to comply with the United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer system (MS4) permit and thereby reduce stormwater quality discharging to the Rio Grande. The City is legally obligated to comply with the requirements of the MS4 permit. Failure to do so puts the City at risk of paying heavy fines for non-compliance and risks stormwater quality in the region, potentially harming important water resources like the Rio Grande. Beyond the legal obligations, successful compliance and execution of the MS4 permit is in line with the City's commitment to be a sustainable and resilient community and protect the environment.

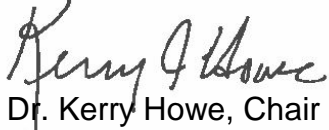
The EPA issued the Middle Rio Grande MS4 permit in December 2014, and it is the first watershed-based permit in the nation. This watershed-based MS4 permit incentivizes cooperation among the 18 permittees in order to meet permit conditions and measures. The proposed reduction will compromise existing financial and cooperative partnerships that ensure regulatory compliance with the MS4 permit.

Stormwater impacts our entire watershed. In urbanized areas such as the Middle Rio Grande, stormwater can degrade water quality. Stormwater programs like the City's have made a difference in

improving water quality in our watershed. In fact, a recent success of the stormwater quality programs is the removal of the long-standing impairment declaration for *E. coli* from three of the four assessment units of the Middle Rio Grande. This is just one example of how the City's efforts in collaboration with the other permittees have contributed to major achievements in improving stormwater quality across the region, which ultimately affects the health of our local environment.

The City has an opportunity to continue the success of the MS4 permit, maintaining its role as a leader in stormwater management across the region and the country. Stormwater quality programs maintained by the General Obligation funding at the City are necessary for sustainability, for investing in green infrastructure, and for ensuring continued compliance with the MS4 permit. We are concerned that the City's proposed 2019-2020 allocation is substantially less than the amount required for regulatory compliance and meeting cooperative obligations. The WPAB advises the City to consider the impacts to water quality of the proposed reduction. We would like an opportunity to meet with you and your staff to discuss these issues further.

Respectfully,



Dr. Kerry Howe, Chair

Water Protection Advisory Board

Cc: City of Albuquerque Council
Bernalillo County Manager's Office
Bernalillo County Commission
Albuquerque Metropolitan Arroyo Flood Control Authority Director's Office
Albuquerque Bernalillo County Water Utility Authority Executive Director's Office