



BOARD OF COMMISSIONERS
CHELAN COUNTY

STATE OF WASHINGTON
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DEPARTMENT OF ECOLOGY

JUN 21 2011

WATER QUALITY PROGRAM

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June 13, 2011

Municipal Stormwater Permit Comments
Washington State Department of Ecology
Water Quality Program
Post Office Box 47696
Olympia, WA 98504-7696

Subject: Eastern Washington Phase II Municipal Stormwater Permit, Preliminary Draft Language

To Whom It May Concern:

On behalf of the Board of County Commissioners (BOCC), thank you for the opportunity to comment on the Eastern Washington Phase II Municipal Stormwater Permit, Preliminary Draft Language. After a discussion with staff, the goals and objectives of this comment period are unclear. It appears that the Department of Ecology (Ecology) has used the permit as a starting point for discussion, instead of developing applicable permit language for the permittees to provide constructive comments on. The BOCC would encourage Ecology to utilize the additional time Engrossed Substitute House Bill 1478 provides to cities and counties to accomplish this task.

Additionally, the BOCC is concerned with the added costs to both the public and private sector as a result of implementing the monitoring and low impact development permit requirements. One purpose of Engrossed Substitute House Bill 1478 is to give counties "fiscal relief during periods of economic downturn". It is unclear how implementing the new requirements of this permit will achieve this goal and assist in minimizing costs in the future.

Lastly, as you are aware in Washington State, the Environmental Protection Agency (EPA) has delegated authority to Ecology to administer the Clean Water Act. It is the responsibility of Ecology to propose permit language, not the local jurisdictions, in order to comply with EPA regulations in accordance with the Clean Water Act.

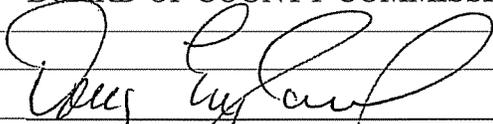
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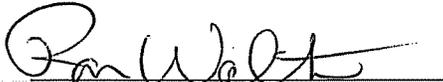
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Thank you for allowing the BOCC to briefly provide comments on Eastern Washington Phase II Municipal Stormwater Permit, Preliminary Draft Language. Chelan County hopes these comments are beneficial to creating a permit that satisfies all involved.

BOARD OF COUNTY COMMISSIONERS



DOUG ENGLAND, Chairman



RON WALTER, Commissioner



KEITH W. GOEHNER, Commissioner

cc: Senator Ms. Linda Evans Parlette, 12th District
Representative Mr. Cary Condotta, 12th District
Representative Mr. Mike Armstrong, 12th District

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