

EMAIL COMMENT

From: Jeff Breckel [mailto:jbreckel@lcfrib.gen.wa.us]

Posted At: Thursday, June 16, 2011 11:59 AM

Posted To: SW Permit Comments

Conversation: Stormwater Permit Comments

Subject: Stormwater Permit Comments

The Lower Columbia Fish Recovery Board (LCFRB) appreciates the opportunity to comment on the Preliminary Draft language for Phase I and II stormwater permits. The Lower Columbia Fish Recovery Board (LCFRB) was established by state law to oversee and coordinate salmon and steelhead recovery efforts in the Lower Columbia region of Washington State. The LCFRB led a federal, state, tribal, and local collaborative process that developed the first salmon and steelhead recovery plan adopted by NMFS and is now actively working with its partners to successfully implement the plan. In addition, the LCFRB is the Lead Agency for Watershed Planning under the Watershed Management Act, and has coordinated the development, adoption, and implementation of Watershed Management Plans for the Grays-Elochoman and Cowlitz basins (WRIA25/26) and the Salmon-Washougal and Lewis basins (WRIA 27/28).

The LCFRB is currently coordinating with other partners in the Lower Columbia region, including Ecology, WDFW, ODFW, ODEQ, US Forest Service, Pacific Northwest Aquatics Monitoring Partnership, BPA, and others to develop an integrated status and trends monitoring (ISTM) program for the Lower Columbia region. This monitoring program will include fish population monitoring as well as monitoring for habitat conditions and watershed health. The monitoring program will support the needs identified in the local salmon recovery plans, watershed management plans, and their associated research, monitoring, and evaluation plan. The development of this ISTM program is a collaborative effort among multiple agencies and jurisdictions. Some of the primary goals of the program include improving data collection efficiencies, ensuring consistent methods when possible, and the ability to share and roll-up data at multiple scales.

The LCFRB supports the development of a regional, southwest Washington monitoring approach to be included in the stormwater permit requirements. The approach developed by the Puget Sound Stormwater Work Group seems adequately vetted for use in Puget Sound, but has not incorporated concerns and issues specific to southwest Washington.

We request that the southwest Washington permittees be given adequate time to develop this regional monitoring approach, including allowing time to collaborate with the development of other monitoring programs, such as the ISTM program for the Lower Columbia. The deadline of August 31, 2011 to have a 'broadly agreed upon' monitoring approach will likely not provide adequate time for this collaboration and coordination.

We look forward to working with the Phase I and II permittees in southwest Washington to develop a monitoring approach to include in their permit requirements that will meet the needs of local jurisdictions and Ecology; leverage other monitoring efforts to gain efficiencies in data collection and sharing; and be consistent with locally-developed region-wide monitoring efforts.

Please feel free to contact me if you have questions.

Sincerely,

Jeff Breckel

Executive Director

Lower Columbia Fish Recovery Board

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