



*City of Richland*  
**Public Works Administration & Engineering**  
840 Northgate Drive  
Richland, WA 99352  
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June 16, 2010

DEPARTMENT OF ECOLOGY

JUN 20 2011

WATER QUALITY PROGRAM

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

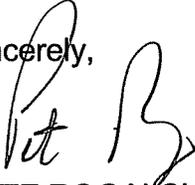
Subject: **EASTERN WASHINGTON MUNICIPAL STORMWATER PERMIT  
COMMENTS**

The City of Richland appreciates the opportunity given to eastern Washington Phase II permittees to comment on the draft re-issue of the NPDES Phase II Permit during an informal comment period. Our general comments on the proposed monitoring requirements are as follows:

1. The early and predominant focus on program effectiveness monitoring is not a fact-based approach targeting programs to water quality improvements. The permit's requirements should direct monitoring according to the sequence and priorities identified in the Stormwater Working Group's Puget Sound monitoring program. Monitoring should begin with receiving water and stormwater characterization, followed by monitoring of stormwater programs effectiveness in addressing identified impairments by stormwater.
2. The monitoring program should be the permittees' responsibility, with program descriptions and data reportable to the public. Other stakeholders, such as tribes, environmental groups, and other interested parties will have access to program descriptions and data, but should not have a role in local government fiscal or program definition.
3. The City believes that a centrally run monitoring program should not be mandated by the permit, and certainly not one that is defined around a specific financial model. There are several program models being developed by the consortium of eastern Washington local government Phase II permittees. A variety of approaches should be enabled by the permit, subject to compliance with technical permit requirements driven by Clean Water Act compliance. Once such approach is documented in the attached white paper drafted by the City of Richland and circulated among the eastern Washington agencies.

Thank you again for the opportunity to work together on the permit re-issue language. We hope this process leads to an effective permit advancing the goals of water quality improvement in eastern Washington. If there are any questions concerning our comments, please contact me at (509) 942-7558 or Nancy Aldrich at [naldrich@ci.richland.wa.us](mailto:naldrich@ci.richland.wa.us) or (509) 942-7508.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Rogalsky". The signature is written in a cursive style with a large, stylized "P" and "R".

PETE ROGALSKY, P.E.  
Public Works Director  
[progalsky@ci.richland.wa.us](mailto:progalsky@ci.richland.wa.us)

cc: Nancy Aldrich  
Permit File

Attachment

**Eastern Washington  
NPDES Phase II Stormwater Permit Re-Issue  
Monitoring Program Comments**

Ecology staff has identified two focus areas of permit content for the re-issued updated permit. They are low impact development (LID) and monitoring. Ecology's informal draft monitoring program requirements revolve around a regional monitoring program administered by either an eastern Washington stakeholders group or Ecology. The Ecology approach follows a model developed over the last few years for Western Washington Puget Sound area Permittees. The Stormwater Work Group, developed to work on west side stormwater issues, identified three focus areas for early stormwater monitoring. They were long-term status and trends, stormwater characterization and effectiveness studies.

In eastern Washington, there has been no Stormwater Work Group to work on stormwater issues. There has been a loose coalition of Phase II Permittees meeting quarterly to work collaboratively on permit issues. As a result, a discussion to define the stormwater problem in eastern Washington water bodies has not taken place.

To immediately move into a effectiveness monitoring program, as proposed by Ecology, would be premature. It is our suggestion that eastern Washington Phase II Permittees develop and execute an eastern Washington interlocal agreement, similar to the Ten Cities Group interlocal, organizing and funding a monitoring program meeting the requirements of the Clean Water Act and the NPDES permit. Through the interlocal agreement, the Permittees would hire a consultant to design and implement the monitoring program. The program would be presented to Ecology staff and independent stakeholders for review and comment. Monitoring results would be published as required by the permit.

Permittees would identify the receiving water bodies in each permitted jurisdiction in eastern Washington for baseline long-term status and trends monitoring. They would access federal, state and local water body sampling data, if available in those areas. If none is available then they will do quarterly sampling of stakeholder selected receiving water bodies in 2013, 2015 and 2017 to develop baseline water quality data.

The stakeholders within the four identified eastern Washington climatic regions will identify representative runoff characterization monitoring sites for quarterly stormwater sampling every two (2) years starting in 2014.

By the fourth year of the permit (2016), the stormwater work group will develop four program effectiveness monitoring study proposals based on the previous sampling.

OR:

Permittees in specific basins, such as the Spokane area, the Tri-Cities area, the Pullman area and Wenatchee may want to develop and execute a region specific interlocal agreement, organizing and funding a monitoring program meeting the requirements of the Clean Water Act and the NPDES permit. Through the interlocal agreement, the Permittees could hire a consultant to design and implement the monitoring program. The program would be presented to Ecology staff and independent stakeholders for review and comment. Monitoring results would be published as required by the permit.

Permittees would identify the receiving water bodies in each permitted jurisdiction in those specific basins for baseline long-term status and trends monitoring. They would access federal, state and local water body sampling data, if available in those areas. If none is available then they will do quarterly sampling of stakeholder selected receiving water bodies in 2013, 2015 and 2017 to develop baseline water quality data.

The stakeholders within the identified regions will identify representative runoff characterization monitoring sites for quarterly stormwater sampling every two (2) years starting in 2014.

By the fourth year of the permit (2016), the stormwater work group will develop two to four program effectiveness study proposals based on the previous sampling.

It is not the intent of the Permit to place more sampling requirements on either option in regions that currently are under one or more TMDL's. They could provide relevant baseline water quality data that can be used in place of additional costly sampling.

It is proposed to hire consultants to develop the sampling process and evaluate the data for the stormwater work group. Funding will be a part of the interlocal agreement with a suggested per population cost. It is also suggested Ecology put forth funding toward the sampling to mirror their financial contributions to the west side stormwater work group.