



Spokane County Public Works
Division of Engineering and Roads

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June 16, 2011

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

Re: Comments on Eastern WA Phase II Municipal Stormwater Permit - Preliminary Draft Language

Dear Ecology:

Thank you for the opportunity to comment on the “Eastern WA Phase II Municipal Stormwater Permit - Preliminary Draft Language”. Please see comments below.

LID Comments:

We agree with Ecology’s proposal to implement the EPA standard of retaining the 95th percentile for the 24-hour storm (or local equivalent) on-site.

Granted the implementation of this requirement into various local ordinances (land use planning, building, roads, etc.) will be multifaceted requiring considerable time. The time needed by local jurisdictions to effectively implement all new and existing code revisions should not be under estimated.

The necessary code revisions will likely be different for each Phase II jurisdiction. Therefore, we propose that any mandated code revisions be afforded the full five years of the second permit cycle to properly evaluate, develop, step through public processes, and pass into law. In addition, codified exemptions such as those based on geology,

redevelopment constraints, and depth to ground water, etc. should be allowed due consideration.

Also, during the extent of the second five (5) year permit cycle, we request that Ecology facilitate the development of a stakeholder participation process (possibly through the Washington Stormwater Center) that focuses on research and development of LID techniques/practices that are appropriate for the varying climatic and geologic conditions present throughout Eastern Washington.

Monitoring Comments:

We support implementing into the second cycle of the Eastern WA Phase II Municipal Stormwater Permit the monitoring proposals described within the *Preliminary Draft* as S8.A., B., C.1. and 2., as well as S8.C.3.b.i and ii.

In addition, we request the inclusion of language that promotes SWMP BMP effectiveness monitoring that focuses around the evaluation of which BMPs that can be more efficiently and/or more successfully implemented at an Eastern region or statewide level.

Please let us know if you have any questions regarding these comments.

Sincerely,

Russ Connole

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