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DEPARTMENT OF ECOLOGY

FEB 02 2012

WATER QUALITY PROGRAM

January 27, 2012

Washington Department of Ecology  
Eastern Washington Phase II Stormwater Permit Comments  
Water Quality Program  
P.O. Box 47696  
Olympia WA 98504-7696

Dear Department of Ecology,

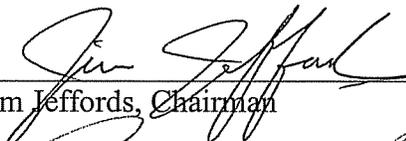
The Asotin County Board of Commissioners are taking this opportunity to comment on the Draft Eastern Washington Phase II Municipal Stormwater Permit – October 19, 2011 (New Permit). We are not in favor of Ecology's proposed Eastern Washington Phase II Municipal Stormwater Permit update. We believe delaying issuance of the new permit (for several years) would be beneficial to all Eastern Washington permittees. The current permit should be given more time for thorough implementation and review of its objectives. Not all of the requirements have been implemented and their costs and effectiveness have yet to be determined. We propose DOE coordinate a panel of Eastern Washington permittees to help in constructing a much more sensible approach concerning monitoring and LID practices. There are many regions in Eastern Washington that differ in the amount of precipitation and storm events that occur annually... so, a one size fits all approach is not practical from an implementation or fiscal standpoint, especially for arid region such as Asotin County.

As you know Asotin County has minimal rainfall/snowfall compared to other areas in our state (even compared to many of the areas in Eastern Washington). We do not see how monitoring or sampling could work realizing our lack of consistent precipitation and infrequent discharges from our outfalls. Not only would the results of monitoring be skewed and extremely unreliable, the process would be a very difficult and expensive practice for us... especially during these economic times. We believe that effectiveness monitoring of our current Stormwater Management Program will provide better and more legitimate information to DOE.

In regards to LID, there seems to be more research and pilot projects conducted relating to this issue for Western Washington. Less information is available about this topic for Eastern Washington. We believe it is important to participate in panel discussions to look at the feasibility for this practice in our local area along with having proper scientific research done concerning LID applications by Washington State University or other similar entities. We feel LID requirements need to be suspended so appropriate studies can be done to truly know what may be effective in Eastern Washington... specifically involving an arid area such as Asotin County.

Thank you for the opportunity to comment on the Draft Eastern Washington Phase II Municipal Stormwater Permit. Asotin County is a small county with very limited financial resources (referenced at the DOE Stormwater Hearing in Spokane Valley on December 6, 2011 during Commissioner Jeffords' and Shinn's public testimony). We are hopeful our perspective is taken to heart by DOE and that a diligent effort is made to review the processes and timeframes specific to our needs and local conditions.

Respectfully,  
Asotin County Board of Commissioners

  
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Jim Jeffords, Chairman

  
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Brian Shinn, Vice Chair

  
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Don Brown, Member