



BOARD OF COMMISSIONERS  
**CHELAN COUNTY**

STATE OF WASHINGTON  
400 DOUGLAS STREET, WENATCHEE, WA 98801  
PHONE (509) 667-6215 FAX (509) 667-6599

CATHY MULHALL  
County Administrator  
[cathy.mulhall@co.chelan.wa.us](mailto:cathy.mulhall@co.chelan.wa.us)

SALLY TAYLOR  
Clerk of the Board  
[sally.taylor@co.chelan.wa.us](mailto:sally.taylor@co.chelan.wa.us)

January 24, 2012

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, Draft Language

To Whom It May Concern:

On behalf of the Chelan County Board of County Commissioners (BOCC), thank you for the opportunity to comment on the draft Eastern Washington Phase II Municipal Stormwater Permit. While Chelan County appreciates the challenges faced by the Department of Ecology (Ecology) in development of the new Phase II NPDES Municipal Stormwater Permit, we are concerned about the overall impact of the proposed permit requirements. We are uncertain that the benefits versus the costs associated with the proposed requirements are fiscally responsible.

The BOCC is concerned with the added costs to both the public and private sector as a result of implementing the new requirements detailed in the draft Municipal Stormwater Permit, including, but not limited to, additional regulations under each of the six minimum control measures, stormwater monitoring, and low impact development. 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.

We are aware that the Environmental Protection Agency (EPA) has delegated authority to Ecology in Washington State to administer the Clean Water Act and thus the Stormwater Municipal Permit. However, Ecology's proposed Municipal Stormwater Permit is beyond the EPA requirements for stormwater control. Ecology should reevaluate what is indeed required by the EPA and remove any additional requirements. In doing so, this allows the county time to fully implement the newly adopted Stormwater Management Program, instead of focusing resources on implementation of new permit requirements.

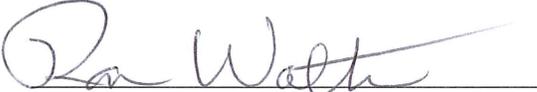
**RON WALTER**  
1<sup>st</sup> District - Wenatchee  
[ron.walter@co.chelan.wa.us](mailto:ron.walter@co.chelan.wa.us)

**KEITH GOEHNER**  
2<sup>nd</sup> District - Dryden  
[keith.goehner@co.chelan.wa.us](mailto:keith.goehner@co.chelan.wa.us)

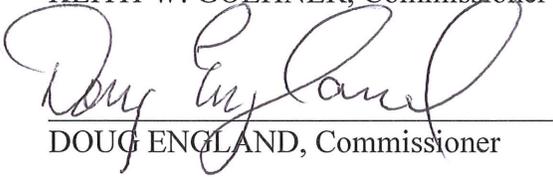
**DOUG ENGLAND**  
3<sup>rd</sup> District - Chelan  
[doug.england@co.chelan.wa.us](mailto:doug.england@co.chelan.wa.us)

Thank you for allowing the BOCC to provide comments on Eastern Washington Phase II Municipal Stormwater Permit. Chelan County hopes these comments are beneficial in creating a permit that meets the goals for all involved.

BOARD OF COUNTY COMMISSIONERS

  
RON WALTER, Chairman

  
KEITH W. GOEHNER, Commissioner

  
DOUG ENGLAND, Commissioner

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

**RON WALTER**  
1<sup>st</sup> District - Wenatchee  
ron.walter@co.chelan.wa.us

**KEITH GOEHNER**  
2<sup>nd</sup> District - Dryden  
keith.goehner@co.chelan.wa.us

**DOUG ENGLAND**  
3<sup>rd</sup> District - Chelan  
doug.england@co.chelan.wa.us