

County of Asotin

# Regional Stormwater Program

P.O. Box 160

135 2<sup>nd</sup> Street

Asotin, WA 99402

509-243-2074

[www.asotincountystormwater.com](http://www.asotincountystormwater.com)

Fax 509-243-2003



January 30, 2012

DEPARTMENT OF ECOLOGY

FEB 01 2012

WATER QUALITY PROGRAM

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

Re: Draft Eastern Washington Phase II Municipal Stormwater Permit – October 19, 2011  
(New Permit)

To Whom It May Concern:

The Regional Stormwater Program is composed of the City of Clarkston, City of Asotin and Asotin County. The three entities signed an interlocal cooperation agreement (ILA) to combine resources into one entity for the purpose of implementing their respective NPDES Phase II Permits. The following comments are presented on behalf of the Regional Stormwater Program.

The Regional Stormwater Program also participates in the Eastern Washington (E WA) Coordinators Group that was formed to combine resources with other E WA Permittees to efficiently and effectively implement Permit requirements, discuss issues, and develop and propose solutions that are beneficial to all Permittees. Our group met on January 12, 2012 to discuss and present comments on the new permit. The Regional Stormwater Program supports the specific comments identified in the letter developed by Spokane County on behalf of E WA permittees.

In addition, the Regional Stormwater Program has the following comments.

Section 5.B.1. Public Education and Outreach. Page 18, lines 22 – 35 outlines requirements for permittees to develop an education and outreach program that measures the target audience's understanding of the stormwater problem and what they can do to solve it. This requirement puts an extra burden on small entities such as ours to develop a social marketing program which includes surveys, focus groups and other tools that are used to measure audiences' understanding. We have identified target audiences as a requirement of the first permit and have provided information for those audiences. However, with the small

staff (one full-time person), taking time to survey those target audiences is a financial and physical burden to our small program. We suggest that this language be deleted and return to the original language.

Page 19, lines 22 – 25 outlines requirements for each permittee to create stewardship opportunities or to build on existing organizations programs to encourage residents to participate in education activities. Again, this places a large burden on our small staff. We don't have those opportunities in our area and creating them takes time away from meeting other permit requirements. We request that this language be removed.

Page 19, lines 26 – 36 again requires permittees to measure targeted behavior of one target audience to improve education program effectiveness.. Again, we request that this language be deleted.

Section 5.B.6 Municipal Operations and Maintenance. We feel that any additional requirements placed on our municipal operations and maintenance (O&M) staff is not necessary. As a requirement of the current Permit, each municipality developed an O&M plan that outlines the work that needs to be conducted to reduce pollutants from O&M activities. This includes a schedule of Best Management Practices (BMPs) that protect water quality and reduce the discharge of pollutants to the maximum extent practicable. By adding the new language, Ecology has mandated the activities that are already in our O&M plans. We request that any new requirements, such as pest waste BMPs, dumpster management, repair and fueling of municipal vehicle fleets be deleted and the original language be maintained. We feel strongly that these requirements are being met in our O&M activities.

Section 8. Monitoring and Program Evaluation. We strongly object to Ecology's suggested language in Section 8. During several meetings with Ecology staff, Eastern Washington permittees were given the impression that we would be able to participate in developing a monitoring program that would provide beneficial information to Ecology and the permittees on the effectiveness of the permit. Ecology assured us that they are not interested in water quality sampling as it will not provide accurate information about the permit and will be expensive to develop and implement. Additionally, in a letter dated February 15, 2011, Ecology Director Ted Sturdevant supported the idea of permittees participating in development of a monitoring program.

“The participation of local governments in permit decisions around such aspects as low-impact development (LID), compliance thresholds, areas of geographic coverage and monitoring is critical.”

We encourage Ecology to delete the monitoring language and simplify the process by allowing the Eastern WA permittees to develop a monitoring program within four years of issuance of this permit. The monitoring program should include identifying data collection that will provide information on the effectiveness of the BMPs used to meet permit requirements, methods to improve the effectiveness of the BMPs if they are not satisfactory, identify potential partnerships between permittees where data collection can be conducted



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efficiently and effectively and a method to report the results of this data collection. Deadlines can be included as milestones for the group to develop the program.

Appendix 6 – Street Waste Disposal. On page 1, line 25 “municipal sanitary sewer” was deleted and replaced with MS4. We are asking whether the original language was correct and should be kept.

Additionally, we do not feel that this requirement is necessary as street waste disposal is handled in our O&M plans. We request that this requirement not be mandated as it is required in the O&M plans and that it be eliminated from the Permit.

We want to thank Ecology for their willingness to work with local governments in the development of this permit and appreciate the opportunity to comment on this permit.

Very truly yours,



Cheryl Sonnen  
Stormwater Program Coordinator