



# LOWER COLUMBIA FISH RECOVERY BOARD

## 2012 BOARD

February 3, 2012

Tom Linde, Chairman  
Skamania County Citizen  
Designee

Municipal Permit Comments  
WA Department of Ecology  
Water Quality Program  
PO Box 47696  
Olympia, WA 98504-7696

F. Lee Grose, Vice Chairman  
Lewis County Commissioner

Randy Sweet, Treasurer  
Cowlitz County Citizen Designee  
Private Property Representative

### ***RE: NPDES permit status and trends monitoring requirements recommendations***

Taylor Aalvik  
Cowlitz Indian Tribe

The Lower Columbia Fish Recovery Board (LCFRB) appreciates the opportunity to comment on the 2012 Draft Municipal Stormwater General Permit. The LCFRB was established by state law to oversee and coordinate salmon and steelhead recovery efforts in the Lower Columbia region of Washington State. The LCFRB led a federal, state, tribal, and local collaborative process that developed the first salmon and steelhead recovery plan adopted by NMFS and is now actively working with its partners to successfully implement the plan. In addition, the LCFRB is the Lead Agency for Watershed Planning under the Watershed Management Act, and has coordinated the development, adoption, and implementation of Watershed Management Plans for the Grays-Elochoman and Cowlitz basins (WRIA25/26) and the Salmon-Washougal and Lewis basins (WRIA 27/28).

Blair Brady  
Wahkiakum County  
Commissioner

Mike Karnofski  
Cowlitz County Commissioner

Irene Martin  
Wahkiakum County Citizen  
Designee

As part of the implementation of both the recovery plan and the watershed management plans, the LCFRB developed a Research, Monitoring, and Evaluation (RME) Program to support the plans. LCFRB's RME Program includes recommendations for habitat status and trends monitoring, fish status and trends monitoring, implementation monitoring, action effectiveness monitoring, critical uncertainties research, and adaptive management. In order to develop more specific recommendations for habitat status and trends monitoring in the Lower Columbia, LCFRB is coordinating with other partners in the region, including Ecology, WDFW, ODFW, ODEQ, US Forest Service, Pacific Northwest Aquatics Monitoring Partnership, BPA, and Clark County to develop an integrated status and trends monitoring (ISTM) design for the Lower Columbia. The development of this ISTM program is a collaborative effort among multiple agencies and jurisdictions. This monitoring program will include fish population monitoring as well as monitoring for habitat conditions and watershed health, and will support the needs identified in the local salmon recovery plans and watershed management plans. Some of the primary goals of the program include improving data collection efficiencies, ensuring consistent methods when possible, and the ability to share and roll-up data at multiple scales.

Tom Mielke  
Clark County Commissioner

Todd Olson  
Hydro-Electric Representative

Jim Richardson  
Skamania County Commissioner

Don Swanson  
SW WA Environmental  
Representative

Charles TenPas  
Lewis County Citizen Designee

Dean Takko  
WA State Legislative  
Representative

Jade Unger  
Clark County Citizen Designee

One of the largest funding gaps in this region is funding for monitoring. Because of this, it is critical to find efficiencies in monitoring efforts across the region. In order to meet the basic needs for region-wide monitoring to support the salmon recovery plan and watershed management plans, LCFRB will need to rely on partners in the region, including Clark County, who have ongoing status and trends monitoring programs, to collect and share their data. The LCFRB appreciates Clark County's efforts as a regional leader in surface water status and trends monitoring, and a long-time supporter of regional monitoring coordination efforts.

Dennis Weber  
SW WA Cities Representative

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Jeff Breckel

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Water Quality Program  
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The ISTM collaborators are currently working to align data collection efforts, including monitoring methods and designs. Clark County is the only local government participating in this process from southwest Washington because they are the only local government with an established status and trends monitoring program in the region. The ISTM process includes development of a prototype master-sample tool for the Lower Columbia region, which will help regional entities like Clark County design and integrate projects based on emerging statistically-based sample draws. The LCFRB supports incorporating and maintaining the integrity of existing monitoring programs as we move toward integrated monitoring strategies on a regional scale.

The LCFRB believes the draft permit's status and trends monitoring requirement proposed for Clark County fails to support ongoing regional monitoring efforts and could interfere with the county's ability to participate in collecting meaningful data at the local and regional scales. Clark County's efforts and limited funding would be better put towards status and trends monitoring as part of the broader regional effort.

The LCFRB suggests continuation of Clark County's ongoing status and trends monitoring program, including continuing efforts to integrate with other entities in the region, as a more appropriate approach to meeting the intended NPDES permit status and trends monitoring requirements. We encourage Ecology to recognize the value of Clark County's decade-long status and trends effort as a valid and relevant approach.

Again, the Board appreciates the opportunity to comment on the permit and is available to answer additional questions if necessary. Please feel free to contact Jeff Breckel, Executive Director at 360 425-1553 or via email at [jbreckel@lcfrib.gen.wa.us](mailto:jbreckel@lcfrib.gen.wa.us).

Sincerely

A handwritten signature in cursive script that reads "Thomas Linde".

Tom Linde, Chairman

Cc: Tom Mielke, Clark County Commissioner Member to the LCFRB  
Jeff Schnabel, Clark County Environmental Services  
Rod Swanson, Clark County Environmental Services  
Ron Wierenga, Clark County Environmental Services