

From: [Rick Rogers](#)
To: [SW Permit Comments](#)
Subject: Comment RE: Draft Phase II Eastern Washington Municipal Stormwater Permit
Date: Wednesday, October 26, 2011 8:19:52 PM

COMMENT:

As regards the following language from the Draft Permit (S1.3.A) for Eastern Washington:

“This permit is applicable to owners or operators of regulated small municipal separate 4 storm sewer systems (MS4s) located in eastern Washington State, which is bounded on the western side by the Cascade Mountains crest except in Yakima and Klickitat counties which are, in their entirety, included.”

Having a single Permit covering this large geographical area is simplistic and unrealistic, based on the many diverse geographic, hydrological, demographic, and political boundaries involved. The fact that subsequent geographical areas of responsibility are defined does not mitigate, but rather exacerbates, and even adds confusion to, this fundamental flaw in the Draft Permit. This was a major one of a myriad of problems with the previous Permit, but there has apparently been zero effort on the part of Ecology to make the Permit more specific to diverse conditions on the ground. Failure to do so not only makes the stormwater issues impossibly complex for a given government entity, but also fatally damages the public opinion of Ecology's competence. It is clear that Ecology has “broad-brushed” Eastern Washington as if it is one homogeneous area; it is not.

For just *one* example (there are many), the Draft Permit for Eastern Washington ostensibly stops at the Western border with Idaho. This is necessary because there are State boundaries involved; Idaho's stormwater regulations operate under the EPA directly, and thus come under completely different rules of jurisdiction. Yet under this Permit and the previous one, the *Washington* State Department of Ecology includes Asotin County and the *Washington* cities of Asotin and Clarkston in an “urbanized area” that is primarily defined by the population and population density of the city of Lewiston, *Idaho*. The hydrological and pollution potentials of the two areas, bisected by the Snake River, are vastly different. This is frankly nonsensical, and further damages Ecology's credibility with the public.

Commenter:

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