

From: [Rick Rogers](#)
To: [SW Permit Comments](#)
Subject: Comment Re Phase II Eastern Washington Draft Permit
Date: Wednesday, October 26, 2011 9:17:11 PM

COMMENT:

Throughout this Draft Permit, additions of reporting requirements to those that already existed in the previous Permit are evident. It appears that there is an entire Department in Ecology dedicated to seeing how many different reports they can dream up requirements for, regardless of their validity for the nominal purpose of improving the quality of the waters of the United States. A prime example follows of a required report:

(from S5.A.4):

The SWMP shall also include coordination mechanisms among departments within each jurisdiction to eliminate barriers to compliance with the terms of this permit. Permittees shall include information in the First Year Annual Report to identify all departments with the Permittee's jurisdiction that conduct stormwater-related activities, their roles and responsibilities under this permit, and a current organizational chart specifying these departments' key personnel.

So let's think about the validity of requiring the report referenced in this last sentence (*highlighted*). Hypothetically, thirty-six seconds after someone finishes compiling the above-referenced report and submits it to Ecology, a person on that list dies; a week later one is promoted; two days after that an employee leaves, five employees are hired, and a month later budget changes force the combining of two departments, each with some small involvement in stormwater activities. The original report is now absolutely worthless for any practical purpose except to keep a person employed at the Permittee's site to generate both it and now the many corrected versions, and another employee at Ecology to file them, because there is little to no productive reason to actually *read* them. A month later, other personnel, department, telephone numbers, etc. changes occur, *all of the above is repeated again*, and on, and on.

Additional requirements for mapping, locating field survey information, public and county employee training, providing copies of reports sent to Ecology also to other agencies, determining which agencies qualify as required or are NOT required under the Permit, inspection requirements, and other requirements in order to document that problems don't exist at a level requiring regulation, or assuming everything DOES require regulation even though no scientific evidence exists that pollutants are even present, are simply outrageous in their unnecessary complexity. For a small county like the one this commenter lives in (Asotin County), just the reporting activities alone required by the Draft Permit could require the addition of at least one full-time employee. The other activities described above will require as many as three or more employees. This in a county with less than 22,000 total residents, NO industry with potential to pollute, and absolutely ZERO evidence, scientific or otherwise, that ANY stormwater pollution of United States waters is being generated AT ALL from Asotin County. This Permit primarily supports creating tax-supported bureaucracy for its own sake. Ecology needs to note the following which is a statement by this commenter that is *as provable* as any assumptions the Draft Permit makes about stormwater pollution emanating from Asotin County: There is more NATURALLY-OCCURRING lead, copper, arsenic, zinc, and other heavy metals flowing past Asotin County in the Snake River *while the commenter writes this* than this poorly-drafted and even-more-poorly executed Draft Permit will prevent from entering the Snake River in the next 10,000 years. The commenter can be confident of the likelihood of being correct about this, because Ecology HAS NEVER TESTED EVEN A SINGLE DROP OF SNAKE RIVER WATER on the shores of Asotin County in order to

establish a baseline from which all other future progress could be measured. Rather than spending scarce resources to identify serious POINT SOURCE pollution sources (many of which are already known) and attacking each with a specific resolution plan, Ecology takes the “flock-shoot” approach, assuming that if you shoot at the flock you *might* hit one bird.

Commenter:

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