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CLARK COUNTY
WASHINGTON

BOARD OF CLARK COUNTY COMMISSIONERS

Betty Sue Morris • Marc Boldt • Steve Stuart

February 13, 2008

Mr. Gregory Winters
Washington Department of Ecology
2108 Grand Boulevard
Vancouver, WA 98661-4622

Re: Phase I Municipal Stormwater Permit

Dear Sir:

I regret to inform you that Clark County is unable to submit draft enforceable requirements, technical standards, and manual to Ecology at this time. We recognize the expectations outlined in sections S5 C 5 b iv and S5 C 7 b i of our Phase I Municipal Stormwater Permit. Our agency takes these expectations and all permit conditions very seriously and continue to make all reasonable efforts to meet permit milestones. In fact, we have been working diligently with our community to craft updates to existing county Water Quality and Stormwater and Erosion Control Codes that will protect surface and groundwater as a resource for drinking water, commerce, recreation, and for wildlife, while also supporting the goals of our recently completed Comprehensive Plan and the *2004 Lower Columbia Salmon Recovery and Subbasin Plan*.

Clark County convened a Stakeholders Advisory Committee (SAC) consisting of representatives from our development, engineering, environmental, neighborhood and educational communities and a Technical Advisory Committee (TAC) to guide the necessary ordinance update. Staff conducted numerous public meetings, including nine SAC meetings, 13 TAC meetings, three Clean Water Commission updates, one Open House hosted by the Clean Water Commission, two Planning Commission updates and three work sessions with the Board of County Commissioners. We have made extensive progress to date. However, even with this extensive work and public outreach, our community has not had adequate time to review the far reaching impacts of this complex update to our Comprehensive Plan and supporting policies and plans. Furthermore, the 12 months provided in our permit has not allowed the appropriate level of public discussion and review essential to successful legislation. Therefore, we do not feel it is appropriate to submit a draft at this time.

Clark County is committed to protecting our water resources. We will continue our diligent work, considering all potential impacts to our community and present comprehensive draft enforceable requirements, technical standards, and manual for your review, as soon as practicable.

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Staff have scheduled a fourth Board of County Commissioners work session for March 12 to further review potential effects of new standards on water quality, land use and salmon recovery. We also plan expanded public outreach. We hope to submit a complete draft by the end of March and work with Ecology staff on a productive review process.

Thank you for your consideration in this important matter.

Sincerely,



Betty Sue Morris, Chair

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