From: Cheryl Sonnen
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Conversation: E WA Phase II Permit
Subject: E WA Phase II Permit

I represent the City of Clarkston, City of Asotin and Asotin County. We have developed a regional program to implement the three permits that have been issued for the three municipalities. The comment I would like to make is that it would make life easier in our region if the deadlines for ordinance development and implementation were extended to the end of the permit term (2012). We are currently working on our IDDE ordinance and feel that we have developed a good ordinance. However, the construction and post-construction ordinances will take more time and be more controversial than the IDDE ordinance.

The extra time afforded by the extension would allow us to consider all aspects of the construction process and develop a more thoughtful and comprehensive ordinance. The current time frame forces us to make decisions with the possibility of overlooking important components. We are in the information gathering stages of the ordinance, gathering comments from inspectors in the public works and building and planning departments. Our next phase will be to gather comments from our Stormwater Advisory Group, the construction industry and citizens. We feel this more comprehensive approach provides the best information possible to develop the ordinance, but it is time consuming. The extra time we are requesting will not slow or stop our current process, it will just give us some breathing room.

Additionally, we would like to extend the deadline for implementation of O&M plans for municipal facilities. We have developed a SWPPP for each entities' facility and have conducted training. Some aspects of the SWPPP plan are being implemented by the facility supervisors. There are several operational BMPs that were identified that the crews are currently implementing or will be implementing. However, there are many structural BMPs and inspection requirements that will be difficult to implement given the current staff and funding levels. Also, we must develop O&M plans for the remaining municipal activities, which will be time consuming for all parties. Extending the deadline for development and implementation of O&M plans allows us to develop a comprehensive plan for all activities and more time for implementation of the O&M plans will allow our crews time to identify and schedule the additional workload required.

As you know, the current economic condition has stressed all municipal budgets. Requiring our municipal staff to conduct additional work with fewer employees and less funding puts even more stress on personnel and budgets.

We are reviewing the option of establishing a utility fee to cover the costs of implementing the Permit requirements, but our information is still preliminary and requires more study. As you can imagine, utility fees are not a popular topic with citizens in the Permit area, and the outcome of this funding option is uncertain. We are making every effort to keep our utility fee costs reasonable for citizens and businesses that are also being impacted by the current economic situation while covering the costs needed by municipal staff to meet permit requirements. Extending the deadline for implementation of O&M plans will not delay changes we make in our operations. But removing the burden of a deadline will allow us to work with municipal staff and reduce the burden of additional fees for citizens and businesses. Our best outcome of this request is for a plan development deadline to be at the end of the current Permit and implementation of those plans to begin at the start of the next Permit.

Thank you for your consideration.

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