



King County

Water and Land Resources Division

Department of Natural Resources and Parks

King Street Center

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Seattle, WA 98104-3855

206-296-6519 Fax 206-296-0192

TTY Relay: 711

June 7, 2010

Julie Lowe
Municipal Permit Comments
Washington State Department of Ecology
P.O. Box 47696
Olympia, WA 98504 -7696

RE: Comments on the Phase I Municipal Stormwater Permit Modification - 2010

Dear Ms. Lowe:

King County has reviewed the permit modification that incorporates Ecology's equivalency determination of Clark County's Alternative Flow Control Program and incorporates minor updates to King County and the City of Seattle equivalency documents. We wish to thank you for the opportunity to provide comments.

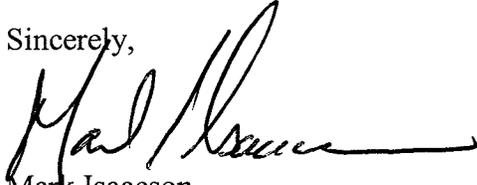
We believe that the flow control program developed by Clark County and approved by Ecology is a valuable and effective alternative approach. It is important that avenues for different approaches to stormwater management be kept open and available to permit holders. This will allow jurisdictions flexibility to adopt the best approach to meet their individual conditions and needs. Ecology allows for other approaches that can provide equivalent levels of flow control protection for receiving waters and the permit allows alternative planning efforts. Ecology's proposal to require permittees interested in adopting this program to have the requirements for the program in place prior to implementation, and to submit program elements and documentation to Ecology for review, should provide additional protection. The purpose of flow control programs is to protect the receiving waters and we believe that this approach can achieve this purpose.

We wish to thank you for the opportunity for this review. We look forward to working with you on various approaches that provide protection to the environment, using solutions that are effective and attainable by our programs.

Julie Lowe
June 7, 2010
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If you have any questions on our comments, please contact Curt Crawford, Stormwater Services Section Manager, at 206-296-8329.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Isaacson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark Isaacson
Division Director

cc: Curt Crawford, Stormwater Services Section Manager, Water & Land
Resources Division (WLRD), King County Department of Natural Resources &
Parks (DNRP)
Doug Navetski, Engineer, Stormwater Services Section, WLRD, DNRP
David Batts, Engineer, Stormwater Services Section, WLRD, DNRP
Steve Foley, Engineer, Stormwater Services Section, WLRD, DNRP