



## King County

### Water and Land Resources Division

Department of Natural Resources and Parks

King Street Center

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Seattle, WA 98104-3855

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TTY Relay: 711

May 1, 2009

Municipal Permit Comments  
Water Quality Program  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504

RE: King County Comments and Proposals on the Draft Permit Modification of the Phase I  
Municipal NPDES Stormwater Permit Issued March 18, 2009

Dear Sir or Madam:

King County has reviewed the Public Draft Permit Modification of the Phase I Municipal NPDES Stormwater Permit issued by your agency on March 18, 2009. We wish to thank you for the opportunity to provide comments. We have enclosed detailed comments and suggestions relating to specific topics, language, and provisions included in the draft modified permit. These are labeled as "comments" in the enclosure.

In addition to comments on the draft modified permit, the Department of Ecology (Ecology) has indicated that it is interested in reviewing proposals that would reduce costs of permit compliance without compromising permit standards. This is in recognition of the change in the economic climate that has occurred since the permit was issued in 2007. Ecology has indicated that these proposals could include the extension of interim deadlines within the current permit term. Such extensions would reduce cost by allowing municipalities to spread the workload over time and if possible provide time to identify and develop revenue sources and ramp-up staffing. Along these lines, King County has identified several ideas, labeled as "proposals" in the enclosure, that would reduce the overall cost of compliance while preserving permit standards.

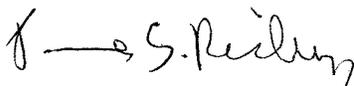
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King County is committed to achieve the goals of improved water quality and effective stormwater management. We believe that our suggestions will improve our ability to achieve these goals while respecting the financial realities of today's world.

If you have any questions, please feel free to contact Doug Navetski, Supervising Engineer in the Water and Land Resources Division, at 206-296-8311.

Sincerely,



for Mark Isaacson  
Division Director

MI:bgd51

Enclosure

cc: Jennifer Keune, Environmental Scientist, Roads Maintenance Section, Road Services Division, Department of Transportation  
Joanna Richey, Assistant Division Director, Water and Land Resources Division (WLRD), Department of Natural Resources and Parks (DNRP)  
Curt Crawford, Manager, Stormwater Services Section (SWSS), WLRD, DNRP  
Doug Navetski, Supervising Engineer, Water Quality Compliance Unit, SWSS, WLRD, DNRP  
Giles Pettifor, Project/Program Manager, Water Quality Compliance Unit, SWSS, WLRD, DNRP  
David Batts, Senior Engineer, SWSS, WLRD, DNRP  
Dean Wilson, Senior Water Quality Planner, Freshwater Assessment Group, WLRD, DNRP