

## Pierce County NPDES Coordinators Group

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TO: Department of Ecology  
FROM: Pierce County NPDES Phase II (& Phase I) Coordinators Group  
DATE: April 27, 2009  
RE: Comments on the March 18, 2009, NPDES Phase II Permit modifications

Thank you for the opportunity to review and provide comments on the March 18, 2009, modifications of the NPDES Western Washington Phase II Municipal Stormwater Permit (Permit).

The Pierce County NPDES Coordinators Group (Group) including City of Puyallup, City of Milton, City of Bonney Lake, City of Buckley, City of DuPont, City of Edgewood, City of Fircrest, City of Gig Harbor, City of Orting, City of Enumclaw, City of Fife, City of Orting, City of Pacific, City of Steilacoom, City of Sumner, and City of University Place would like to extend our thanks to you and all staff involved in the efforts to prepare the Washington State Municipal Stormwater permits.

In total, there are 16 Phase II Permittees located within Pierce County and the Group has been meeting since the beginning of this Permit cycle to coordinate efforts, exchange information and share resources during development and implementation of our individual stormwater programs. In addition, the City of Tacoma and Pierce County participate as needed.

The Group's collective goal has been to work together, stay on task, meet each of the required deadlines, and address each component of the Permit. Our communities are dedicated to developing stormwater management programs that will protect the Puget Sound from further negative impact by stormwater runoff and improve water quality for future generations.

Through Group discussions it is apparent that the most difficult issue for us will be financial sustainability in order to assure we have means to implement the Permit components within our Communities. The awarded grant money to communities was a great help in the initial year of Permit implementation though we see problems in the future with having the available funds to develop and implement some of the programs required in the Permit.

Specifically there are concerns with having financial support available to purchase equipment and fund staff positions to address the Illicit Discharge Detection and Elimination (IDDE) and the Operations and Maintenance (O&M) requirements. Both of these programs require expensive equipment, staff availability for field work, and also the ability to apply enforcement when necessary.

During these economically challenging times, several municipalities do not currently have the mechanism to increase utility fees to fund comprehensive stormwater programs. As a solution we are urging Ecology to provide or offer additional grant funding for this mandated stormwater program.

Sincerely,



Tim Parham, Czar  
Pierce County NPDES Coordinators Group