

From: Joy Bader [jbader@co.walla-walla.wa.us]
Posted At: Friday, May 01, 2009 8:15 AM
Conversation: comments on proposed modifications to Phase II Municipal Stormwater Permit for E WA
Posted To: SW Permit Comments
Subject: comments on proposed modifications to Phase II Municipal Stormwater Permit for E WA

- 1) The proposed modification to S5.4.a shifts the deadline for the effective date of the construction stormwater ordinance by one year, but does not shift the deadline for adoption of the ordinance. Walla Walla County suggests shifting the adoption date of the ordinance by one year as well to allow more time for development of the construction stormwater management code.
- 2) The proposed modification to S.5.5.a shifts the deadline for the effective date of the post-construction stormwater ordinance by one year, but does not shift the deadline for adoption of the ordinance. Walla Walla County suggests shifting the adoption date of the ordinance by one year as well to allow more time for development of the post-construction stormwater management code.
- 3) Walla Walla County suggests changing from an annual reporting and SWMP update schedule to a biennial reporting and SWMP update schedule. With the retention of record-keeping requirements and the discharge reporting requirements under S4, jurisdictions will still be required to verify compliance with the Phase II Municipal Stormwater Permit. However, biennial reporting will significantly reduce the amount of time spent generating reports and documents that may not change significantly from year to year anyway. Otak, Inc estimates that Walla Walla County will need to spend a month of staff time and \$22,500 per year preparing and submitting an annual report and updating and submitting the SWMP – time and money that could be used to greater effect elsewhere, especially given that the estimated population of Walla Walla County's Phase II Permit area is only 7,000 people.
- 4) Walla Walla County suggests modifying the requirement in S5.6.a (ii) to require inspection of 50% instead of 95% of known storm drainage facilities every two years. Problem facilities identified during the initial inspections can be inspected more frequently.
- 5) Walla Walla County suggests removing the monitoring preparations required in S.8.C from this 5-year permit cycle, and considering shifting responsibility for actual sampling and monitoring to Ecology, to be accomplished on a whole-watershed basis in a manner similar to the development of TMDLs. A whole-watershed approach will ensure that funding targets areas of greatest importance, that consistent methods are applied, and that the most qualified personnel are locating the sampling sites and performing the monitoring studies. A whole-watershed approach may also eliminate duplicative efforts... there's no reason that both Walla Walla County and the City of Walla Walla need to monitor similar land-uses within the City of Walla Walla and its urban growth area, and the funds that would have been spend performing duplicative work could be used elsewhere, for greater good.

Joy Bader
Walla Walla County Public Works
Stormwater Program Manager
(509) 524-2727