



Public Services

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VERN M. REDIFER, P.E., Director

April 21, 2009

Municipal Permit Comments
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

DEPARTMENT OF ECOLOGY

APR 21 2009
WATER QUALITY PROGRAM

Re: PROPOSED PERMIT MODIFICATIONS TO THE EASTERN WASHINGTON
PHASE II MUNICIPAL STORMWATER PERMIT

Yakima County would like to thank the Department of Ecology for the opportunity to comment on the proposed permit modifications. We offer the following comments:

- 1) Section S4. Yakima County supports the proposed modifications that specify adaptive management process in response to discharges of toxicants to waters of the State of Washington which would violate water quality standards. By specifying a response on the part of the permittee, the permit is now clear that such discharges are not automatically permit violations provided the permittee follows the adaptive management process. A definition of adaptive management in "Definitions and Acronyms" would provide clarification of the process.
- 2) Section S5.B.4.a and S5.B.5.a. Yakima County supports the proposed modification specifying that Construction and Post-construction ordinances must be effective no later than four years after the effective date of the permit. This change removes confusion and potential conflict from the current permit language.
- 3) Section G3. Yakima County supports the proposed change that combines notification requirements into one location in the permit and one process for discharges to and from the MS4.

If you have questions regarding our comments, please contact Brian Cochrane, (509) 574-2354.

Sincerely,

Donald H. Gatchalian, P.E., Assistant Director
Yakima County Public Services

c: Terry Keenhan, Yakima County
Jim Bridges, City of Sunnyside
Dennis Henne, City of Union Gap
Doug Mayo, City of Yakima