

Graul, Carrie (ECY)

From: Swanson, Rod <Rod.Swanson@clark.wa.gov>
Sent: Thursday, June 23, 2016 3:57 PM
To: ECY RE Stormwater Permit Comments (WQ)
Cc: Boening, Dean
Subject: Comment on draft phase I permit Appendix 10 modification

Thank you for the opportunity to comment on the draft phase I permit modification. Clark County has comments related to the permit's reference to the Clark County Stormwater Manual.

In part 2: E.3., Clark County requests that the permit simply reference the Clark County Stormwater Manual as effective January 8, 2016 and omit language referring to Ecology's October 15, 2016 letter. We request the language removal because the issues listed in the October 15 letter were addressed in the manual adopted on November 24, 2015, removing them as issues after manual adoption. Regarding the effective date, the code and manual became effective at midnight January 7, 2016, making the manual apply to development applications submitted after January 7.

In Part 2: E.3.3.a., there is discussion of the Clark County-specific calibration of the WWHM. This entire section is not needed because the Clark County Stormwater Manual does not reference any local model, only the approved continuous flow model which includes the Ecology-maintained WWHM as modified in 2015 to include the Clark County-specific calibrated model parameters.

Please contact me if you have any questions about these suggested permit language revisions.

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