

September 27, 2005

Karen, this is in response to your request for comments concerning the draft Eastern Washington NPDES stormwater permit.

The NPDES Stormwater Program is a Federal and State UNFUNDED MANDATE. There is no clear demonstration that implementing this program throughout Washington will effectively improve storm water runoff or improve water quality. Instead of the federal and state governments wasting citizen funds collected through local taxes the federal and state governments should permit local agencies to identify REAL problems (if they exist) and use limited financial resources to solve those problems. In essence the NPDES program is simply a result of the federal and state governments inappropriately and improperly budgeting for county and city elected officials. It is the local elected officials that are selected by citizens to budget at the local level. The federal and state governments need to keep their fingers out of the local wallet and stick to their own budgets. If the federal and state governments believe that this program is so critical to pass legislation mandating the program THEY SHOULD FUND IT.

Additionally, the state government should finance their own staff through state taxes and not require local governments to finance state employees. Not only does the state require local governments to waste resources by financing this potentially ineffective program and require local elected officials to tax citizens at the local level to finance local employees, the state requires city and county governments to finance the state employees that will administer the NPDES program. Even the federal government has the courtesy to finance their own employees, a practice that the state government should look into.

In summary, the NPDES program is not a fix to a storm water problem it is simply a program to bloat state bureaucracy at the expense of city and county budgets. I challenge the state to demonstrate that the funding spent on this program actually fixes a stormwater problem.

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