



# SKAGIT COUNTY PUBLIC WORKS DEPARTMENT

1800 Continental Place, Mount Vernon, WA 98273-5625  
(360) 416-1400 FAX (360) 416-1405

November 14, 2018

Abbey Stockwell  
Washington Department of Ecology  
Water Quality Program  
P.O. Box 47696  
Olympia, WA 98504-7696

Re: Comments on Draft Phase II Municipal Stormwater General Permit

Dear Ms. Stockwell:

Thank you for the opportunity to provide comments on Ecology's Draft Phase II Municipal Stormwater General Permit. While Skagit County supports Ecology's pollution control efforts, Skagit County is concerned that the new permit requirements will be challenging to implement in the required timeframes without additional funding. For example, with respect to the source control program for existing development, Skagit County foresees limitations in the effectiveness of this program if private citizens do not allow staff access to their properties. However, this limitation is not addressed in the permit. It will also take additional time for Skagit County to implement a source control program for existing development since Skagit County does not have a business licensing requirement. Developing an inventory of commercial and industrial businesses in the NPDES coverage area will involve a significant effort to prepare. Skagit County needs additional funding and staff to implement this program.

Furthermore, Skagit County is concerned about the Comprehensive Stormwater Planning requirements and the effectiveness of such a program. Given the geography of Skagit County's NPDES coverage area, which borders several other municipalities, there is no permit requirement to work together with neighboring jurisdictions to develop a true regional strategy. Skagit County's planning efforts are also limited by the lack of coordination with Ecology on Industrial and Construction General Permits issued by Ecology in Skagit County. Thank you for listening to our concerns. Enclosed is a spreadsheet with additional comments on the draft permit.

Sincerely,

Michael See  
Water Resources Section Manager  
Skagit County Public Works

Enclosure

cc: Dan Berentson, Skagit County Public Works Director  
Hal Hart, Skagit County Planning & Development Services Director  
Tim Holloran, Skagit County Administrator