



# Public Works Department

Spokane County, Washington

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November 7, 2018

Abbey Stockwell  
WA Department of Ecology  
Water Quality Program  
PO Box 47696  
Olympia, WA 98504-7696

RE: Comments on the DRAFT 2019-2024 Eastern Washington Phase II Municipal Stormwater Permit

To Washington State Department of Ecology:

Thank you for the opportunity to review and comment on the Eastern Washington Phase II draft Municipal Stormwater Permit (Permit), effective August 1, 2019, through July 31, 2024. Spokane County, the City of Spokane, and City of Spokane Valley appreciate the effort Ecology has made over the last few months to work with Eastern Washington jurisdictions throughout the reissuance process. And we offer the following comments on the draft Permit.

The draft Permit, Section S5.B.1.b, Page 13, states the following:

“Each Permittee<sup>4</sup> shall measure the understanding and adoption of the targeted behaviors for at least one target audience in at least one subject area. No later than August 1, 2021, Permittees shall use the resulting measurements to direct education and outreach resources most effectively, as well as to evaluate changes in adoption of the targeted behaviors.”

Additionally, footnote (4), Page 13, reads:

“<sup>4</sup> By no later than August 1, 2023, new Permittees shall begin using the results of measurements to direct education and outreach resources more effectively, as well as to evaluate changes in adopted behaviors.”

We propose to change the completion date of measuring “the understanding and adoption of the targeted behaviors for at least one target audience in one subject area” **from August 1, 2021, to August 1, 2023.** And, further, changing implementation of “the results of measurements to direct education and outreach resources” **from August 1, 2023, to August 1, 2024.**

In the context of stormwater education and outreach (E&O) development, we recognize that the level of public awareness, identification of target behaviors and target audiences, and an understanding of

motivation behind behavior change are all critical considerations for measuring program success. However, most Eastern WA Permittees do not have sufficient staffing levels or knowledge in this subject area to undertake E&O program evaluation themselves. As such, this request for additional time will allow Permittees to: 1) Complete a thorough and relevant Effectiveness Study with the assistance of a consultant, if they so choose; and/or, 2) Apply for a Grant of Regional or Statewide Significance (GROSS) during the next available grant cycle to fund this new Permit task.

Thank you, in advance, for your consideration of these comments. Please don't hesitate to call me, Amanda Hess, at (509) 477-7284, if you have questions or would like additional information.

Sincerely,



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