

"The Mission of the Eastern Washington Stormwater Group is to provide an influential unified voice and support for Eastern Washington Municipal Stormwater Permittees by sharing resources and communicating common interests and needs related to stormwater permit requirements"

Eastern Washington Stormwater Group

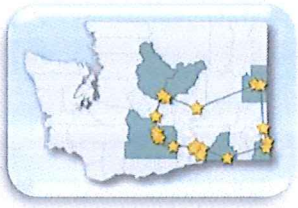
October 11, 2018

Abbey Stockwell, Municipal Stormwater Senior Planner
Water Quality Program
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms. Stockwell,

At the October 11, 2018 meeting of the Eastern Washington Stormwater Group (EWSG) in Moses Lake, WA, consensus was reached by the members in attendance on a list of comments for your consideration on the Draft Eastern Washington Phase II Municipal Stormwater Permit.

1. Section S5.B.1.a.iii Ecology proposes that each Permittee shall measure the understanding and adoption of targeted behaviors for at least one target audience group no later than August 1, 2021 to direct education and outreach more effectively. We propose that this requirement language be removed from this section and moved to the S8. Effectiveness Studies section.
2. Section S5.B.3.f Ecology proposes a new record keeping requirement for reporting illicit discharges which includes entering the information in Ecology's new WQWebIDDE portal as specified in Appendix 7. We believe that the new web portal reporting and schema requirements should be removed because they are onerous and overreaching. All Permittees are already required to track and report illicit discharge incidents. Jurisdictions have invested in their own database logging, tracking and reporting systems. The requirement to make changes to their computerized systems so the information can be entered and stored in an Ecology database would be a substantial financial burden to the Permittee and their ratepayers. Also, staff time entering the same information in a duplicate Ecology database is a waste of the Permittees' resources.
3. Section S5.B.6.a Permittees shall implement a schedule of municipal Operation and Maintenance activities (an O&M Plan). Permittees shall review and, if needed, update the O&M Plan no later than December 31, 2021. We proposed to change that date to August 1, 2024 to allow for more time to review and update the O&M Plans and SWPPPs.
4. Section S5.B.6.h A portion of this section was removed from the draft permit and not correctly shown on the redlined version of the draft. We believe that the removed portion, "Generic Stormwater Pollution Prevention Plans that can be applied at multiple sites may be used to comply with this requirement" should be included back into the draft permit language. For the last two permit cycles, Permittees have been allowed and required to develop and implement these types of Stormwater Pollution Prevention Plans (SWPPPs). We have also invested staff resources in revising these plans over the years and training local personnel on how to follow them. This change will now require Permittees to write many more SWPPPs which will use up even more staff resources in the future and will lead to confusion due to unneeded multiple SWPPPs.
5. Section S8.2 Ecology proposes that each Permittee coordinate with other local governments in their designated Urban Area to plan and begin an additional stormwater management program effectiveness study. We believe the eight studies required to be implemented by Permittees during the current permit cycle will not be completed by the time the new permit becomes effective. In some cases, the studies will just be getting



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started. Upon completion, the eight studies will result in "recommended future actions based on the findings" that will generate ideas for future studies. However, to require additional studies in the next permit cycle before we learn the results of the current studies seems premature. We propose that the eight studies be completed and the results of the studies analyzed before adding a requirement for additional studies in the next permit.

Thank you for the opportunity to provide comments on the draft stormwater permit.

Sincerely,

A handwritten signature in blue ink that reads "Shilo C. Sprouse". The signature is written in a cursive, flowing style.

Shilo C. Sprouse, Chair
Eastern Washington Stormwater Group