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Conversation: Phase II Western Washington Muncpal Stormwater Permit Modifications -
comments
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Subject: Phase II Western Washington Muncpal Stormwater Permit Modifications -
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Regarding Extending Interim Permit Deadlines

Extension of deadlines is a good idea, in concept, but still does not address the underlying problem: funding. Small cities have very little money for implementing these mandates, and the economic downturn has not helped the situation. Whether the deadlines remain as they are or are extended, smaller municipalities will still be struggling to find the money to comply. The Department of Ecology grant from two years ago was key in allowing agencies to meet the permit deadlines, but that grant expires at the end of June 2009. Another grant of the same size and similar time frame would be far more helpful than any changes to the deadlines in the permit.

Other

There are a number of agencies, including the City of Milton, that adopted the 2005 Department of Ecology Manual for Western Washington in its entirety. The existing permits, including the proposed modifications, are very confusing as they may or may not relate to the 2005 DOE Manual. For example, S5.C.4 Controlling Runoff from New Development, Redevelopment and Construction Sites requires adoption of an ordinance or other enforceable mechanism to control runoff from new development, redevelopment and construction sites. Those agencies who have already adopted the 2005 Manual in its entirety are left with a dilemma, wondering if they have already met that requirement or not. Although I believe the NPDES permit and the 2005 DOE Manual were intended to work together, there are virtually no connections linking the two documents. Further guidance in how the permit requirements fit or do not fit with the 2005 DOE Stormwater Manual requirements would be extremely helpful.

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