September 1, 1999

Megan White, Manager
Water Quality Program
Washington State Department of Ecology
Post Office Box 47600
Olympia, WA 98504-7600

RE: Annual Report for NPDES Permits WASM13001, WASM23001, and WASM33001

Dear Ms. White:

I am writing to report on the status of King County’s stormwater management program (SWMP) as required under condition S10 of our National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater General Permits (numbers WASM13001, WASM23001, and WASM 33001), which were issued on July 5, 1995. This report focuses on compliance activities for calendar year 1998, which marked significant progress towards resolution of outstanding SWMP approval issues, in addition to ongoing excellence in all the reported programs.

For this report, I have included a narrative piece that briefly addresses the report elements enumerated in the permits. I have also included a variety of reporting tables that provide more detail on the status of the programs described in our SWMP. While I am aware that Ecology prefers calendar year reports to be submitted by March 31 of the following year, the response demanded by the Endangered Species Act (ESA) listing of chinook salmon in February of this year has necessitated a shift of resources to address the many permitting and consultation issues raised by the listing. In addition to the need to shift NPDES staff to ESA compliance in the short term, the realities of our financial reporting system further make it difficult to provide complete calendar year financial analysis in March. The final numbers for the Water and Land Resources Division are frequently not available until late March or early April. The official numbers for King County as a whole are often unavailable until summer. Consequently, it is difficult if not impossible for the County to provide a complete calendar year report, including the financial analysis, by March 31 of the following year.

Further, in May of 2000, the County is scheduled to switch to new accounting software. The magnitude of this change could delay reporting of final 1999 numbers. The final numbers for 2000 may similarly be delayed. As a result, while substantive reporting information about our NPDES programs may be available by the end of March in following years, the financial analysis may not be.
While calendar year financial reporting is not feasible on the schedule that Ecology has requested, mid-year to mid-year reporting is not feasible at all for a number of NPDES programs. I trust that we will be able to work together over the next months to arrive at a mutually agreeable solution to this reporting problem.

Please do not hesitate to call me at (206) 296-6585, or Luanne Coachman, Program Analyst, at (206) 296-8381 to discuss this report and the appended materials.

Sincerely,

Nancy Hansen
Manager

cc: Ed O'Brien, Washington State Department of Ecology
    Luanne Coachman, Program Analyst, Regional Water Resources Services, King County