

This document is in response to your request for further explanation of the terms of a partnership between SEMSWA and Arapahoe County, in lieu of transfer of the NPDES MS4 Stormwater Permit.

The County proposes proceeding by way of a partnership wherein SEMSWA would be responsible for administrative issues related to stormwater management. The County would retain the liability under the permit, as well as final decision making on interpretations of code and policy.

In very general terms, addressing the six parts of the permit:

- 1) Public outreach—SEMSWA would assume all responsibility as outlined in the draft IIGA
- 2) Public involvement and participation—SEMSWA would assume all responsibility as outlined in the draft IIGA
- 3) Illicit Discharge—SEMSWA would assume all education, detection and enforcement up to court action. Any court action would be taken by the County, in the name of the County.
- 4) Pre-construction—SEMSWA would assume all administration and inspection, including NOV's which would be coordinated and approved by the County. Any Court action would be taken by the County, in the name of the County. All non-capital project GESC permits would continue to have joint approval with permit issuance by SEMSWA in the name of Arapahoe County. GESC permits for capital projects would be issued by the County after referral to SEMSWA.
- 5) Post-construction—SEMSWA would assume administrative review on a referral basis. SEMSWA would be responsible for all inspections. Acceptance of the post construction BMP will be granted by the County following SEMSWA's recommendation.
- 6) Pollution prevention and housekeeping—SEMSWA would assume administrative review on a referral basis and provide recommendations and resources on training.

SEMSWA and the County would agree on reasonable fees to be collected by SEMSWA after an analysis and evaluation of the respective fee structures.

Any fees for services SEMSWA chooses to have performed by outside consultants would be assumed by SEMSWA.

Other stormwater services and funding, beyond the transfer of the permit, would continue by SEMSWA and SOP's would be drafted to further clarify the roles of the parties.