

City of Sammamish Comments on the 2019-2024 NDPES Draft Permit

Outreach and Education

1. Suggest formatting change in this section to clearly identify 1.a. general awareness, 1.b. behavior changes and 1.c. stewardship. The draft permit language identifies stewardship under 1.e and a number of the behavior change requirements as 1.c. and 1.d.
2. S5.C.1.a requires the education and outreach program to be designed based on local water quality and demographic information to identify high priority target audiences, subject areas, and/or BMPs. What will Ecology require to justify our selection of target audiences, etc.?
3. Clarify the list of target audiences in general awareness and behavior change requirements. For the list in S5.C.1.a.i. (a), is the selection of the general public as the target audience acceptable or are businesses also part of this target audience? Similarly, will all the target audiences in the list in (b) be required? Suggested edit:
(b) Target audiences include engineers, contractors, developers, and land use planners. A minimum of one target audience in this list is required to be provided education and outreach on a minimum of one subject area from the list below.

IDDE

Please clarify what is meant by “potential illicit discharges.” Does Ecology want reporting on unconfirmed discharges?

Source Control

1. Please clarify the minimum performance measure requirements. Clarify that this is requirement is only within the MS4 (eg, publicly owned facilities) or if it requires privately owned property containing pollution generating surfaces to provide operational source control BMP.
2. Is the 20% inspection rate based on the inventory established August 1, 2021?
3. How often does the site inventory need to be updated (once per permit cycle)?
4. O.b.iii(a): Please clarify that the inspection program is focused on “all identified sites with a business address **within the Permittee’s jurisdiction.**”
5. O.b.iii(b): Please clarify if Permittees can count those properties for which they are denied entry against the 20% target.
6. O.b.iii(c): Permittees may be challenged to inspect 100% of complaints associated with mobile businesses when outside the Permittee’s MS4.
7. O.b.iii(c): Please clarify if the inspections associated with legitimate complaints count toward our 20% annual targets.
8. O.b.iii(c): How do these inspections overlap with IDDE inspections?

Mapping

Suggest list approach of what should be mapped to better define Permanent Stormwater Facilities.

Monitoring

We would support local monitoring efforts be given at least 50% credit for this requirement.