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| Program Title | Permit Section | Specific Language | Comments |
| IDDE tracking and reporting | 3 | "Attach a zipped xml file" | The City has concerns regarding the ability to provide a zipped xml file. This will not be an easy task using the flat file asset management system currently used by the City. The City would need to go through a pretty robust process in order to extract the data and turn it into csv format and then convert it into an xml format. If the City were to move to a GIS reporting standard, there is concern with the amount of work involved in program code writing in order to extract an xml file. Any of these options just creates duplicative work effort. The City currently operates over 400 software programs with ten employees. The City suggests the following options that may be easier for Ecology to get the data and documentation they are looking for and simpler for other municipalities. The suggested format is for Ecology to provide an empty schema and an empty excel spreadsheet both in formats that Ecology wants. This would allow a municipality the option of collecting data and reporting in either of the two formats. These formats should be easy for Ecology to upload into any database format for their use. Another recommended option would be for Ecology to develop/build their own collector app to collect a location point and input tabular data. There are free apps like ESRI collector or Survey123. There could be a service contract that allows municipalities to log into an enterprise service account and collect data in the field in real time. Then the data would be reported instantly to Ecology. Because the data would be housed on Ecology’s server, there would be a need for a protocol in which municipalities could obtain the data for their records. |
| IDDE tracking and reporting | Schema #15 | education/technical assistance | This is not a correction/elimination method. This should be its own E&O field with drop downs. Some options for drop downs include technical assistance provided, education material provided, posted education material onsite, referral for training, etc. |
| IDDE tracking and reporting | 2 | "...potential illicit discharge..." and "...potential incidents..." | the City is concerned with the term “potential” in front of illicit discharge or incidents. The definition of potential means having or showing the capacity to become or develop into something in the future. It’s unclear how to develop our program around verbiage like this, it is difficult to understand where an illicit discharge investigation would start or stop. There is a “potential” for an illicit discharge in every vehicle that travels down the road, or every restaurant grease container, every covered stockpile, every construction site, etc. There is a need for a better defined term that provides a beginning and an end point. |
| Education and Outreach (E&O) | S5.C.1 | "Each Permittee shall implement what is developed regionally at the local jurisdiction." | We would like the flexibility to have this be optional. While we work in tandem with our regional partners, sometimes we have our own unique messaging or priorities specific to our jurisdiction, watershed, or constituency. We wouldn't want to be locked into something we disagree with. Using the verbiage "shall" means we are locked in. Our recommendation is to remove this sentence. |
| Education and Outreach (E&O) | S5.C.1.a.i.a | "Impacts of illicit discharge and how to report them" | By removing the subject area "Impacts of illicit discharge and how to report them" It limits our ability to reach and educate the general public regarding how to identify spills; when and how to report them. A large portion of the population is still unaware about basic stormwater pollution and the need to prevent and respond to spills. Often illicit discharges are discovered in heavily populated areas by municipal staff. Many citizens will be walking through the spill and never bother to question the problem, let alone make a notification. We still need to educate the public on this issue. |
| Education and Outreach (E&O) | S5.C.1.a.ii.a. |  | Under Target Audiences, need to include Engineers, Contractors, Developers, and Land Use Planners. Under BMPs, need to include Sediment and Erosion BMP's. If these are not included, then jurisdictions are unable to develop CBSM campaigns targeting Sediment and Erosion Control for Construction. In Thurston County this is a high water quality priority and we have already begun the process of developing CBSM Programming at a Regional level. Our partners in this CBSM program development include Department of Ecology, Thurston County, Cities of Lacey, and Tumwater staff. This has been over a one-year effort already, and we are 1/3 of the way into program development. The City wants to be ensured the CBSM program we are currently working on will be accepted by Ecology for reporting purposes in the 2019-2014 NPDES Permit. If our program does not meet the proposed language requirements, we will be forced to quit our current campaign process in order to begin work on another such that we meet the permit requirements. |
| Education and Outreach (E&O) | S5.C.1.b.i. | "...each Permittee shall conduct a new evaluation of the effectiveness of the ongoing behavior change program (required under S5.C.1.a.ii of the 2013-2018 Permit)." | There is concerns regarding conflicting language "shall" and "ongoing" in the following statement "Permittees "shall" conduct a new evaluation of the effectiveness of the "ongoing" behavior change program under the 2013-2018 permit" and section iii under b. "Develop a strategy and schedule for a new target audience and BMP behavior change campaign" We believe in using the language "shall" and "ongoing" that we are restricted to updates to our programs and campaigns under the current permit. This will prevent us from creating a "new target audience and BMP behavior change campaign" that fall under the requirements of the new permit to develop CBSM campaigns for high local water quality priorities. |
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