

City of Marysville

The new source control program may require additional staff to implement.

Source Control Section: The O&M section already requires a SWPPP and practices, policies and procedures to reduce stormwater impacts associated with fertilizers, pesticides and herbicides. Part of the SWPPP should already include source control activities and inspections to ensure BMP's are adequate at publicly owned facilities. Do not duplicate those requirements in the new source control section. If Ecology has seen that O&M programs are not being implemented as intended, add requirements to the O&M section.

Source Control Section, b.iii.c: change "legitimate" to "substantiated" or "verified" "stormwater or source control complaints." Many people have legitimate complaints about their neighbors, most of which have absolutely nothing to do with pollution prevention or stormwater.

Define the new term "permanent stormwater facilities" in the Stormwater Manual for Western Washington or the Permit Glossary. Right now, it is not clear, and seems to include BMP's installed to meet minimum requirement 5.

The mapping guidance makes "connection point" and "outfall" more confusing. Specifically, Figures 4, 7, and the additional guidance for the definition of "Outfall". Please eliminate references to adding an outfall if a municipality has knowledge that a private system discharges to a surface water. Where those two systems meet is a connection point. The end of a stormwater system is the outfall, public or private.