

Phase I, WW Phase II, and EWA PH II Formal Draft Comments

Name	Document	Section	Page	Comment
Newcastle	WWA Phase II	Coordination	17	Please define "watershed." It is used here and in other places throughout the permit. A "watershed" can be many different sizes, such as Lake Washington Watershed or Coal Creek watershed. Define "watershed" so we know what size/scale to coordinate on.
Newcastle	WWA Phase II	Comprehensive Stomwater Planning (WWA)	18	Permittees are required to assess and report on newly identified administrative or regulatory barriers to implementation of LID principles and BMPs. Should we be reporting on maintenance barriers as well?
Newcastle	WWA Phase II	Comprehensive Stomwater Planning (WWA)	19	Define "receiving waters."
Newcastle	WWA Phase II	Comprehensive Stomwater Planning (WWA)	19	Define "basin" or remove the word.
Newcastle	WWA Phase II	Comprehensive Stomwater Planning (WWA)	19	Permittees are required to assess "existing information" and identify "significant gaps." Please expand on these terms. What type of "existing information" can we use? Can we use observational and anecdotal information? What constitutes a "significant gap?"
Newcastle	WWA Phase II	Education and Outreach	21	We can meet requirements as part of a group by "adopting regional programs..." "The permittee shall participate in the regional group and implement the regional program in the local jurisdiction." Please expand on this. Does the programming have to occur in each jurisdiction or can jurisdictions support and advertise events occurring in nearby jurisdictions. An example of this is "Don't Drip and Drive." Small jurisdictions like Newcastle don't have the facilities to hold leak check events, but if we advertise regional messaging and events happening nearby does this count as "adopting regional programs?"
Newcastle	WWA Phase II	Education and Outreach	21	Education and Outreach programs must be "based on local water quality information and target audience characteristics to identify high priority target audiences, subject areas, and/or BMPs." Jurisdictions will be conducting a receiving waters basin assessment and prioritization (S5.C.1.c), and writing a Stormwater Management Action Plan (SMAP), due 12/31/2022. Due dates for the education and outreach programs should be after the SMAP is completed so that we can use the water quality data and basin prioritization information to inform where and how to implement our programs.
Newcastle	WWA Phase II	Education and Outreach	22	Define target audience "land use planners." Does this include in-house planners in other departments, such as community development?
Newcastle	WWA Phase II	Education and Outreach	23	Permittees are required to conduct a "new evaluation of the effectiveness of the of the ongoing behavior change program." Some permittees discontinued behavior changing program after they "measured the understanding and adoption of the targeted behaviors... no later than February 2, 2016" as required under 2013 permit. If we weren't required to continue the program, how can we be required to re-evaluate it?

				Education and Outreach programs, including behavior change programs, must be "based on local water quality data." Jurisdictions will be conducting a receiving waters basin assessment and prioritization (S5.C.1.c), and writing a Stormwater Management Action Plan (SMAP), due 12/31/2022. Due dates for the behavior change program should be after the SMAP is completed so that we can use the water quality data and basin prioritization information to inform where we should implement our behavior change programs. If deadlines aren't moved back, we will have to conduct two separate prioritization processes, one for SMAP and one for ed/outreach. Suggested deadlines are as follows: Develop program- 7/31/2022. Begin to implement the program/ strategy- 9/1/2022. Evaluate and report on the changes in understanding and adoption of targeted behaviors- 8/31/2025.
Newcastle	WWA Phase II	Education and Outreach	23-24	
Newcastle	WWA Phase II	IDDE	33	Remove the requirement to report on potential illicit discharges that are investigated by permittee but not found.
Newcastle	WWA Phase II	Operations and Maintenance	38	Add a compliance clause similar to inspections with compliance achieved at 95% of those identified for maintenance as being completed.
Newcastle	WWA Phase II	Reporting Requirements	73	Because the first part of 2019 is subject to 2013-2018 permit and the second half of 2019 is subject to 2019-2024 permit, we suggest Ecology does not require permittees to submit an annual report for 2019. An annual report covering two separate permits would be overly time consuming. We suggest first annual report is due no later than March 31. 2021.