

| Phase I, WW Phase II, and EWA PH II Formal Draft Comments | | | | |
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| Name | Document | Section | Page | Comment |
| Bothell | WWA Phase II | Comprehensive Stormwater Planning (WWA) | 17 | Please clarify the requirement to report on activities undertaken during the 2013-2018 permit cycle. Is the intent for the jurisdiction to simply share "if" and how they incorporated water quality and watershed protection into their Stormwater and Growth Management Act (GMA) Comprehensive Plan? What if a jurisdiction does not update its plan until the GMA-scheduled update in 2023? Since there was no requirement in the 2013-2018 permit cycle to undertake the described activity, would "we didn't use our water quality data to inform an 'out of cycle' update to our long-range Comprehensive Plan" be an acceptable response? |
| Bothell | WWA Phase II | Comprehensive Stormwater Planning (WWA) | 19 | The City of Bothell would support the concept of a voluntary multi-jurisdictional effort, but not another mandatory watershed regional collaboration. We would support additional time given to those participating as an incentive to undertake a voluntary major collaborative effort. |
| Bothell | WWA Phase II | Comprehensive Stormwater Planning (WWA) | 20 | The City requests that Ecology support a collaborative effort to provide a guidance document that includes a template for reporting requested information. The template would provide some consistency across jurisdictions as to what the planning exercise will provide. For example, overlay transportation planning maps with stormwater planning maps to see the areas where priorities overlap. |
| Bothell | WWA Phase II | Comprehensive Stormwater Planning (WWA) | 20 | The City is concerned that SMAP priorities will overrule projects that are rated high in value for other criteria, such as a retrofit within a transportation overlay project or to address flooding. We suggest allowing for an "and" approach to retrofits rather than requiring all funding to be used in prioritized areas only. We are concerned that projects within the SMAP area will take precedence over other projects outside of the SMAP that may have greater water quality benefit. |
| Bothell | WWA Phase II | Education and Outreach | 23 | The City requests Ecology remove the word "ongoing" in this section to allow for the creation of new programs based on lessons learned. "No later than July 1, 2020, each Permittee shall conduct a new evaluation of the effectiveness of the ongoing behavior change program (required under S5.C.1.a.ii and S5.C.1.c of the 2013-2018 Permit)." |

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| Bothell | WWA Phase II | Education and Outreach | 24 | For stewardship we request to change the word “create” to “provide” and advertise stewardship opportunities. This allows us to utilize existing successful community outreach and volunteer events rather than having to create new opportunities. |
| Bothell | WWA Phase II | IDDE | 27 | New language in S5.C.5.a limits the methods by which illicit discharges can be identified. We suggest exchanging “must” for “may” in the sentence that reads: “Illicit connections and illicit discharges must be identified through field screening, inspections, complaints/reports, construction inspections, and/or monitoring information as appropriate. |
| Bothell | WWA Phase II | IDDE | 30 | Revisions to S5.C.5.d.i change language from “may” to “must” in regard to using the Source Tracing Guidance Manual or allowing an equivalent manual. The City has concerns about requiring the use of a specific guidance manual that was written with the intention of assisting other jurisdictions in defining their methodology. Guidance documents are not intended to be regulatory. Making a guidance document required in permit language automatically creates resistance and discourages jurisdictions from undertaking the task of creating future guidance documents. |
| Bothell | WWA Phase II | IDDE | 33 | The first annual report under the new permit is due in spring of 2020, and is to cover the activities for all of 2019. The new permit language modifies the IDDE data being collected and the format in which that data is transmitted to Ecology. In order to meet this requirement, we would need to begin collecting data in this new format beginning January 1, 2019 which is prior to August 2019 new permit issuance. We would like to request lead time after adoption of the permit to update our databases for this change. We feel that beginning to collect data in the new format January 1, 2020 for reporting in the 2021 annual report is a more feasible timeline. |
| Bothell | WWA Phase II | IDDE | 33 | Revisions to S5.C.5.g adds the requirement to submit data for all illicit discharges “reported to” the jurisdiction. While we understand the intent to give credit for efforts being conducted by jurisdictions that may not have been recognized before, we feel that the data collected should provide a valuable benefit for future analysis. We request that the required information be limited to those that enter the MS4 and fall under the G3 category or are legitimate and investigated by the permittee. |

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| Bothell | WWA Phase II | IDDE | 33 | Also, the way the requirement is written, any phone calls alleging a spill will need to be captured for reporting. At Bothell, we have calls answered by several different divisions and departments within the City. While all staff have been given staff IDDE training, they are not users in the database used to collect the data we submit to Ecology. We do not have a mechanism to capture all the calls that are screened out before coming Public Works for various reasons, for instance several thousand residents have a Bothell address but they reside in a different jurisdiction. Limiting the data collected to incidents found or investigated by the Permittee would be much cleaner and provide more useful data. Alternatively, the "reported to" could be limited to those that are trained response staff who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges. It is reasonable to expect that these staff are connected to and trained in filling out the IDDE database. |
| Bothell | WWA Phase II | Controlling Runoff (WWA) | 33 | We have had several issues related to interpretations of how the drainage review requirements apply to subdivisions developed under a previous stormwater manual. The guidance given in the current permit Fact Sheet conflicts with the permit's definition of redevelopment and the description of the permit's application for redevelopment. Could you please incorporate the FAQ language into the permit itself for clarification and consistency among the permittees? |
| Bothell | WWA Phase II | Operations and Maintenance | 38 | Permittees have repeatedly requested that all references to a 100% compliance threshold be reduced. In O&M, the 100% requirement is on maintenance timelines for cleaning facilities that have been identified to have an exceedance of maintenance standard (particularly catch basins). This means missing one catch basin out of thousands triggers a G20 notification. Reducing the requirement to 95% or 98% would be helpful in reducing the need to submit G20's for a small oversight. |
| Bothell | WWA Phase II | Source Control Program (WWA) | 51-54 | The terminology; properties, businesses, and sites is used in the draft to refer to the same inventory. The City would like clarification on what each of these terms mean to Ecology, and how each of them can be counted towards the annual 20% requirement and the 100% inventory. Ideally one single defined term would be used for consistency in meeting those quantitative requirements. |

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| Bothell | WWA Phase II | Source Control Program (WWA) | 51 | The King County Pollution Prevention Manual refers to treatment BMPs as the treatment facilities listed above. There is some confusion across jurisdictions as to what this term means. Do treatment BMP's mean those that are used for minimum requirement 6: Water Quality, or those that are mentioned in the Stormwater Pollution Prevention Manual? Please limit the scope of this language to BMPs like roofs or others that fall short of requiring the business to retrofit their permanent water quality facility to current design standards. |
| Bothell | WWA Phase II | Source Control Program (WWA) | 51 | We would also like to request an FAQ from Ecology for questions surrounding the Source Control Program for Existing Development. |
| Bothell | WWA Phase II | Source Control Program (WWA) | 53 | Permittees have requested that all references to a 100% compliance threshold be reduced. In Source Control, a new 100% compliance requirement is introduced on inspections of businesses identified through legitimate complaints (S1.A.1.iii(c)). There is no room in a 100% compliance requirement for property owners that won't respond or deny access. |
| Bothell | WWA Phase II | Source Control Program (WWA) | 53 | How are properties where access is denied counted in the compliance of source control, both towards the 20% businesses annually and towards the 100% of sites identified through complaints? M&O allows for the denial of access, so we request that the source control section have similar language to S5.C.7.a.ii |