

Phase I, WW Phase II, and EWA PH II Formal Draft Comments				
Name	Document	Section	Page	Comment
Kent	WWA Phase II	Mapping and Documentation (WWA)	23	Clarification needed. Are we meant to map downspout control, etc.?
Kent	WWA Phase II	Mapping and Documentation (WWA)	23	Map outside drainage boundary? Need clear language as to what is required here.
Kent	WWA Phase II	IDDE	28	Permit should allow for time to get WQWebIDDE format set up for reporting.
Kent	WWA Phase II	Controlling Runoff (WWA)	29	King County has until December 31, 2020 to complete their adoption/implementation of new standards. This gives Phase II Permittees a year to adopt the King County manual to meet this requirement. However, Phase I Permit language allows for some flexibility on this deadline based on possible delays in the review by Ecology. If this occurs this would set us back and we do not have the flexibility written into our permit language. We should be given the allowance of one full year after King Co. gets the go ahead from Ecology and adopts their new manual updates.
Kent	WWA Phase II	Source Control Program (WWA)	37	"Structural source control BMPs, or treatment BMPs/facilities, or both, must be required for pollutant generating sources if operational source control BMPs do not prevent illicit discharges or violations of surface water, groundwater, or sediment management standards because of inadequate stormwater controls." This requirement may have a significant financial impact on property owners who developed their property prior to when water quality treatment standards went into effect. This requirement should be removed from the language in these sections and be replaced with educational program that incentivizes structural retrofits on these existing non-conforming sites. If Ecology keeps this structural retrofitting language, they need to provide the legal basis Permittees can use to justify implementation of this retrofitting requirement.
Kent	WWA Phase II	Source Control Program (WWA)	38	Language should be added to this section identifying that Permittees may count denial of access to properties towards the 20% annual inspection performance standard. Permittees have no control over whether or not a property owner will allow access to private property and Permittees should not be penalized for it.