

Phase I, WW Phase II, and EWA PH II Formal Draft Comments - City of Federal Way				
Name	Document	Section	Page	Comment
Federal way	WWA Phase II	Appendix 7		Unfunded mandate significantly increasing the City's liability and the required time to implement this site assessment.
Federal way	WW Phase II	Responsibilities of Permittees	30	It is unclear where the City is to get both the personnel and the funds to operate this required program.
Federal way	WW Phase II	Responsibilities of Permittees	31	Item c .v - establishes a minimum level of schedule inspections to meet but does not clearly define the total number of inspections or what each inspection entails.
Federal way	WW Phase II	Responsibilities of Permittees	31	Item e - requires the City to provide sufficient training without providing a mechanism to pay for this required training.
Federal way	WW Phase II	Responsibilities of Permittees	17	Item b.i - Clearly states that the intent is to make LID the preferred and commonly-used approach to site development but does not consider Cities where the soil is not conducive to LID.
Federal way	WWA Phase II	Appendix 8	N/A	Suggest adding parks, urban agriculture, demolition of any structure, and any landfill or excavation.
Federal way	WW Phase II	Operations and Maintenance	39	Please clarify a start date for the new maintenance requirements in S5.C.7.b.i.a.
Federal way	WW Phase II	Source Control Program (WWA)	51	Please provide more clarification on S5.C.8.a.i in regards to application of structural source control BMPs for existing development. Is this a technical assistance type application or are we actually requiring installation of structural BMPs when we identify a site that has pollution generating sources?
Federal way	WW Phase II	Source Control Program (WWA)	53	S5.C.8.b.v -- please provide guidance on "ongoing training program" for source control activities.
Federal way	WW Phase II	Education and Outreach	pg. 20/S5.C.2	"Effect" behavior change is an impractical requirement, influence might be the better wording.
Federal way	WW Phase II	Education and Outreach	pg. 20/S5.C.2	High priority audience is highly subjective and wide open to interpretation. The wording and ambiguous intent will leave permittees open to conflicting priorities from political and social interests. Recommend either defining it better or removing this sentence all together.
Federal way	WW Phase II	Education and Outreach	pg. 20/S5.C.2	If allowing jurisdictions to set the parameters to local water quality issues is the intent, the ambiguous wording is okay, but if Ecology has something in mind, this better needs defining.
Federal way	WW Phase II	Education and Outreach	21	S5.C.2 ii (b) NLT July 2020, conduct new evaluation... what is the expectation for what qualifies as an evaluation? Without a clarification of what the expectation is, there will be a wide variety and inconsistency among permittees for this effort
Federal way	WW Phase II	Compliance with Standards	13	S4.F.1 - Recommend removing the words "or likely" from this section. Regulatory or code violations cannot be cited based on something that is not currently underway or has not happened.
Federal way	WW Phase II	Reporting Requirements	50	S9.A - beginning in 2020 annual reporting for next permit cycle means keeping track of two sets of reports, one for the previous permit and one for the new. Request Ecology consider a gap year for reporting requirement
Federal way	WW Phase II	Monitoring and Assessment	70 of 92	S.8.B.3 All permittees shall submit records... This wording precludes a permittees inability to submit records, either due to lack of records, records not in the format requested or an inability to meet the timeframe required for submission. Recommend it be changed to include something along of the lines of shall, to the best of the permittee's ability, provide the requested data. Also, a minimum notification time for the data request could also be included in the permit that provides guidelines to the requestor on what an adequate notification would look like.