

Port of Seattle

The Port of Seattle respectfully submits comments on the formal draft of the Phase I Municipal Stormwater Permit. Our suggested revisions are intended to clarify language so that regulated parties can effectively manage stormwater and protect our local and regional water bodies

We appreciate the opportunity to provide comments on this important stormwater document. If you have questions on the Port's comments please contact Jane Dewell, (206) 787-4669 or dewell.j@portseattle.org. Thank you.

Jane Dewell
Maritime Stormwater Program Manager | Port of Seattle

Phase I, WW Phase II, and EWA PH II Formal Draft Comments					
Name	Document	Section	Page	Comment	Comment Made By
Port of Seattle	Phase I	Appendix 1	Section 4.5, Page 25	<p>Draft Phase I Permit Text Section 4.5, Minimum Requirement #5: On-Site Stormwater Management <i>Flow Control Exempt Projects</i> Projects qualifying as Flow Control exempt in accordance with the Threshold Discharge Area (TDA) Exemption in 4.7 Minimum Requirement #7: Flow Control shall either:</p> <ul style="list-style-type: none"> • Use the LID BMPs from List #3 for all surfaces within each type of surface in List #3; OR • Use any Flow Control BMP(s) desired to achieve the LID Performance Standard, and apply BMP T5.13: Post-Construction Soil Quality and Depth. <p>Comment The Phase I Permit Fact Sheet (page 85) identifies that for MR7: "The proposed language is updated to ensure that a TDA discharging to a marine waterbody meets all exemption requirements before it can be determined to be Flow Control exempt. This will ensure the same protection of waterways between the TDA discharge point and the marine waterbody as is provided with other types of exempt waterbodies." An exception should be added to the new requirement so that waterfront properties/project sites discharging directly into a marine waterbody or flow control exempt receiving water are not required to evaluate/implement these flow control/LID BMPs as there are no waterways to protect between the discharge point and flow control exempt receiving water.</p> <p>Suggested Revision <i>Flow Control Exempt Projects</i> <u>With the exception of project sites that discharge directly to a "Flow Control Exempt Receiving Water" identified in Appendix I-A,</u> projects qualifying as Flow Control exempt in accordance with TDA Exemption in 4.7 Minimum Requirement #7: Flow Control shall either:</p> <ul style="list-style-type: none"> • Use the LID BMPs from List #3 for all surfaces within each type of surface in List #3; OR • Use any Flow Control BMP(s) desired to achieve the LID Performance Standard, and apply BMP T5.13: Post-Construction Soil Quality and Depth. 	Port of Seattle
Port of Seattle	Phase I	Appendix 5	Page 4	<p>Draft Phase I Permit Text 25. Updated maintenance standards, as necessary, per S6.E.6.a.ii? (Required no later than July 1, 2016)</p> <p>Comment Text from previous version of permit should be deleted.</p> <p>Suggested Revision 25. Updated maintenance standards, as necessary, per S6.E.6.a.ii? (Required no later than July 1, 2016)</p>	Port of Seattle