

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

Name	Document	Section	Page	Comment
Lake Forest Park	WWA Phase II	S5.C.1.a.i.(a) - Comprehensive Stormwater Planning	17 of 92	The City requests that the following section be removed from the Permit. <i>On or before March 31, 2020, the Permittee shall describe how water quality and watershed protection were addressed during the 2013-2018 permit cycle in updates to the Comprehensive Plan (or equivalent) and in other locally initiated or state-mandate long-range land use plans that are used to accommodate growth, or transportation.</i> This language eludes to a task that was not a requirement of the 2013-2018 permit and therefore should not be addressed in the new 2019-2024 Permit.
Lake Forest Park	WWA Phase II	S5.C.1.a - Comprehensive Stormwater Planning	17 of 92	Please verify and adjust (if necessary) the deadlines created for long-range stormwater planning. The Permit deadlines should align with GMA-required periodic updates of the Comprehensive Plan. Municipalities would be able to report on how water quality and watershed protection were addressed only after the completion and adoption of the Comprehensive Plan updates and not any sooner.
Lake Forest Park	WWA Phase II	S5.C.2 - Public Education and Outreach	20 of 92	The City requests that the word “create” be replaced with “offer” in the following sentence. <i>“Create stewardship opportunities that encourage community engagement in addressing the impacts from stormwater runoff.”</i> The City would like the ability to utilize both existing and new stewardship programs and not be solely responsible for the creation of all new stewardship opportunities.
Lake Forest Park	WWA Phase II	S5.C.2.a.ii.(b) - Public Education and Outreach	23 of 92	In the 2013-2018 Permit, it was not clearly specified that the behavior change program should be an “on-going” program as the language in section S5.C.2.a.ii.(b) indicates. The City kindly requests that this section be revised to evaluate a new program as a part of the upcoming permit cycle (2019-2024) to avoid confusion.
Lake Forest Park	WWA Phase II	S5.C.5.g - Illicit Discharge Detection and Elimination	33 of 92	In order to achieve compliance with the record keeping requirements of this section and others throughout the Permit, a ramp up period of 1 year, should be included to allow for transition of current reporting processes and adaptation of new recording requirements that follow Appendix 12 and WQWebIDDE. Please also take into account, there are several other updated reporting requirements throughout the Permit that add to the work load of sometimes 1 or 2 responsible staff for a jurisdiction and that those responsible staff members may have other duties outside of NPDES related work.
Lake Forest Park	WWA Phase II	S5.C.8.a.ii - Source Control Program for Existing Development	51 of 92	Please revise this section to address either public and privately owned commercial and industrial <u>businesses</u> or <u>zoned properties</u> . It is not clear which commercial and industrial properties should be included as a part of this program.

Lake Forest Park	WWA Phase II	S9.A - Reporting Requirements	73 of 92	The City is requesting a gap year in annual reporting due to the restructuring of the permit document and program transition from the current 2013-2018 Permit cycle to the 2019-2024 Permit cycle. It is not clearly described or understood how jurisdictions will report on requirements that are modified and relocated within the Permit halfway through the reporting period. The City requests that the first official annual report be submitted in 2021 for the 2020 reporting period.
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