

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

Name	Document	Section	Page	Comment
Lynnwood	WWA Phase II	Education and Outreach	21	S5.C.2. needs a bit more clarification. What exactly is meant by "participate in the regional group"? Does this mean attending meetings for this group and providing input or does it go as far as contributing monetarily to the program? This also leads into the following requirement "implement the regional program in the local jurisdiction". Does this require holding an event for the program in your city or would advertising for the program and its' events fulfill the intent of this statement?
Lynnwood	WWA Phase II	Education and Outreach	21	S5.C.2.a - What is meant by "local"? Is this referring to city, county, regional or statewide water quality information? Also, what can the city use as local water quality information? Does this information need to come from a formal report or monitoring results, or could it come from known issues in the city as well as public comments?
Lynnwood	WWA Phase II	Education and Outreach	23	S5.C.2.a.ii.(b) - The term "ongoing" is a somewhat confusing. In the past some programs ran seasonally or were stopped due to ineffectiveness. "Ongoing" could give the impression that the same program needs to be used and ran continuously through the term of the permit. If a program is started and then determined to not be working, is the jurisdiction required to tweak the program to address the problem or will they be able to develop or find a more suitable program?
Lynnwood	WWA Phase II	Education and Outreach	23	S5.C.2.A.ii.(c) - This section implies that the Permittee needs an employee/consultant well versed in Community-Based Social Marketing to comply with this requirement. If the Permittee is not participating in a regional group to meet this requirement it might create a hardship and prevent the Permittee from meeting the real intention of this section.
Lynnwood	WWA Phase II	Reporting Requirements	73	S9.A Says the first annual report will need to be submitted by March 31, 2020. This new permit takes effect in August of 2019. The report required for 2019, due in 2020, will cover portions from the new permit and old permit. The proposed changes and moving of sections might make reporting very difficult that first year. I suggest foregoing the report due in 2020 to avoid this issue.
Lynnwood	WWA Phase II	Comprehensive Stormwater Planning (WWA)	17	C.1.a.i.(a) Lacks specificity. Description could be "complied with previous permit." What is expected in this report, and what is it supposed to accomplish? Does Ecology expect permittees to submit their SW Comp Plans?
Lynnwood	WWA Phase II	Comprehensive Stormwater Planning (WWA)	19	C.1.c. "Permittees shall document and assess existing information..." Document existing information is redundant. Why not just submit or reference existing information?
Lynnwood	WWA Phase II	Operations and Maintenance	38	C.7.a.ii. For the exceedence and circumstances beyond permittee control, will permittee be required to submit a G20 letter in addition to the documentation required in this section?
Lynnwood	WWA Phase II	Operations and Maintenance	49	C.7.e. "...implement and document..." what level of documentation is expected? If permittees are expected to comply with the maintenance recommendations of the SWMMWW, isn't that documentation enough?
Lynnwood	WWA Phase II	Source Control Program (WWA)	51	C.8.a.iii. Local Permittees cannot be charged with enforcing regulations on a site already covered by a separate NPDES Permit. It is Ecology's responsibility to enforce their own permit.
Lynnwood	WWA Phase II	Source Control Program (WWA)	51	C.8.a.iv. What are acceptable "practices to reduce...?" This seems like a very nebulous term.
Lynnwood	WWA Phase II	Source Control Program (WWA)	51	C.8. This whole section is incredibly onerous and expensive to comply with. It is impossible without the addition of staff, and doesn't consider that the Permittee may not be able to add more staff (financially or politically). Further, compliance can be subjective, and abused.