

2018 EWA Pase II Stormwater Permit Draft					
Public Review Comment Log					
E-mail completed comment log by November 14, 2018 to: SWPermitComments@ecy.wa.gov					
No.	Reviewer Name	Name	Date	Section, Figure, Table, or Appendix #	Review Comment
1	Morgenroth	Yakima County	11/14/18	Section S5.B.3.a	Ecology has proposed new mapping requirements in this section that will require permittees to update the maps of their MS4s. These updates include an electronic mapping format and additional features and attributes such as known connections, discharge points and stormwater facilities. Yakima County understands the importance of having a complete and correct map of the MS4 however, we do not feel that Ecology appreciates the required effort and expense it would take to for permittees to fulfill this requirement in one permit cycle. For jurisdictions that need to make the change to digital mapping and include the additional features and attributes, this will be a heavy lift that will require hiring the expertise to create this product, not to mention the ongoing maintenance requirement for these maps. This obligation will create a financial burden for many jurisdictions and their ratepayers.
2	Morgenroth	Yakima County	11/14/18	Section S5.B.3.f.	Ecology has proposed new Illicit Discharge and Detection Elimination (IDDE) reporting requirements that include the compatibility of a data schema outlined in the permit's Appendix 7 and the WQWebIDDE. Yakima County opposes this new reporting requirement and the new data schema requirements. This reporting proposal is onerous and a burden on jurisdictions that would require them to spend limited resources to change the existing database tracking and reporting systems that are currently in place. It is also a duplication of effort on the permittees' part since IDDEs are also reported to Ecology in the annual report. At a minimum, we would request that the jurisdictions be allowed to report this information in an easier, more industry standard format such as a CSV file or some other readily exportable file format. Requiring permittees to report information in this fashion is an unnecessary financial burden on the ratepayers of the jurisdiction.
3	Morgenroth	Yakima County	11/14/18	Section S5.B.6.h.	Ecology has removed language from this section that allows Generic Stormwater Pollution Prevention Plans (SWPPPs) that could be applied to multiple locations. Yakima County would prefer that this language be placed back in the new permit for this section. Generic SWPPPs are cost effective, time savings tools that are especially useful for large jurisdictions that have numerous material storage areas, maintenance areas and heavy equipment storage areas to create pollution prevention plans for. Removing the allowance of generic SWPPPs will mean that jurisdictions will have to spend additional time and resources creating individual SWPPPs, which is an unnecessary obligation to our ratepayers.
4	Morgenroth	Yakima County	11/14/18	Section S8.A.2.	Ecology proposes that Permittees plan, begin or participate in an additional stormwater management program effectiveness study by March 2021. By Ecology's account, this could result in up to ten more effectiveness studies during the next permit cycle. Yakima County proposes that the original eight studies that were started under the current permit cycle be completed and the results evaluated before adding this requirement for additional studies. The deadline of March 2021 is not enough time to analyze the results of the original eight studies and implement any changes as a result. We would recommend no new effectiveness requirements prior to March 2023 of the next permit cycle.