

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

Name	Document	Section	Page	Comment
Marysville	WWA Phase II	Comprehensive Stormwater Planning (WWA)	19	<p>S5.C.1.c.i - Stormwater Management Action Planning - The City requests that the following language: "<i>Where significant gaps in the state of knowledge exist, a plan and protocol should be developed to improve the assessment.</i>" be clarified.</p> <p>Marysville has interpreted that this requirement would apply to information related to basin characteristics as a whole, not just the stream. For example, a gap could be identified that an aerial imagery analysis is needed to determine impervious cover, or analysis of pollutant sources to the MS4. If Ecology intends this to be a narrow focus related exclusively to stream analysis then the language should be modified or removed. Most Permittees pay into the regional monitoring effort to avoid the costs of developing and implementing stream monitoring programs.</p>
Marysville	WWA Phase II	Comprehensive Stormwater Planning (WWA)	19	<p>The Stormwater Management Action Planning Guidance (Pg. 1 bottom) states that the purpose of the SMAP is to answer two questions, one of which is "How can we meet our future population and density targets while also accomplishing our water quality goals?" However the draft permit only talks about addressing "existing development" (S5.C.1.c.ii last sentence). The Permit already has requirements for addressing new development. The state Growth Management Act regulates how municipalities plan for future growth. The Guidance seems to extend past the purview of this permit by requiring planning for future growth.</p>
Marysville	WWA Phase II	Education and Outreach	23	<p>Section S5.C.2.b is confusing for several reasons. The requirement of an "ongoing" program does not appear in the current permit 2013-2018 cycle. Permittees were already required to assess the education and outreach program from the 2013-2018 permit cycle. "Ongoing" also gives the impression that the same program needs to be used continuously through out the term of the permit. Please remove this section.</p>
Marysville	WWA Phase II	IDDE	33	<p>S5.C.6.g Recordkeeping. There should be a ramp up period for the WQWebIDDE system. While the system does not require any new information to be recorded, it will take time to make the technical changes required to make current databases export data in the correct format. This will cause many permittees to manually duplicate their records in order to stay in compliance. It is an unnecessary time burden. If the requirement could begin January 1, 2020 permittees would have time to automate the process.</p>
Marysville	WWA Phase II	Source Control Program (WWA)	53	<p>S5.C.8.b.iii.b Please add "The Permittee may count inspections that resulted in a denial of access to the site toward the 20% inspection rate."</p>
Marysville	WWA Phase II	Source Control Program (WWA)	53	<p>S5.C.8.c remove or modify this requirement to inspect sites "identified through legitimate complaints." The IDDE section already requires Permittees to investigate complaints and this duplication will complicate the record keeping process. There is no way to know if a complaint is "legitimate" and related to stormwater until after you investigate, so it is redundant and ambiguous.</p> <p>If it needs to remain please modify to read "Each Permittee shall inspect 100% of sites identified through legitimate stormwater complaints"</p>
Marysville	WWA Phase II	Reporting Requirements	73	<p>Between the 2007 and 2013 permit cycles there was a gap year where no annual report was required. That practice should be implemented again because there are new sections and content has been moved around. That will make the 2019 annual report, due March 31, 2020, very cumbersome. How the different sections will be cross referenced is not shown in the annual report questions that appear in Appendix 3.</p> <p>Please modify S9.A to read "No later than March 31 of each year beginning in 2021...."</p>