

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

Name	Document	Section	Page	Comment
Bellevue	WWA Phase II	Compliance with Standards	13	S4.F.1 The language uses current and/or future tense suggesting a discharge is active and/or ongoing. Ecology often asks that we produce S4.F letters after a discharge has occurred and cleanup is either completed or is not possible. S4.F letters have to be signed by the CMO. If Ecology would like a S4.F letter after the fact for all discharges that may have been a likely violation of water quality standards. Change the language in S4.F.1 to reflect past , present and future tense. Add 'has or' after Permittee in line three to read... "A Permittee shall notify Ecology in writing within 30 days of becoming aware, based on credible site-specific information that a discharge from the MS4 owned or operated by the Permittee has caused or is causing or contributing to a known or likely violation of Water Quality Standards in the receiving water. An example would be a garbage truck that catches fire, has a slurry from fire-fighting that reaches the MS4, is cleaned up on the same day, and is resolved completely prior to the S4.F letter being submitted up to 29 days later. The trash truck "has caused" or contributed to a likely violation of Water Quality Standards, but it no longer "is causing" a likely violation
Bellevue	WWA Phase II	Comprehensive Stormwater Planning (WWA)	17	S5.C.1 Consider changing 'Comprehensive Stormwater Planning' to Integrated Stormwater Planning or something similar. The word 'Comprehensive' conflicts with existing City Comprehensive Plans and may cause confusion between the two.
Bellevue	WWA Phase II	Comprehensive Stormwater Planning (WWA)	17	S5.C.1.a.i.(a) Clarify expectations on information that is expected to be reported on how watershed protection was addressed in the 2013-2018 permit cycle. Also suggest not using the term 'Comprehensive Plan' in this section. Rather, use something like 'City Plans' to reference all pertinent documents.
Bellevue	WWA Phase II	Comprehensive Stormwater Planning (WWA)	18	S5.C.1.a.i.(b) Delete the term 'Comprehensive Plan' and replace with 'City Plans' or similar. The Comprehensive Plan is integrated with the Growth Management Act and should not be confused with the NPDES permit.
Bellevue	WWA Phase II	Comprehensive Stormwater Planning (WWA)	18	S5.C.1.c It is unclear how Ecology will be approving the SMAPs. We are concerned that there will be a push towards more aggressive SMAP requirements (e.g., stormwater retrofits) that will have significant budget and rate impacts in future years.
Bellevue	WWA Phase II	Comprehensive Stormwater Planning (WWA)	19	S5.C.1.c.i Clarify the last sentence... <i>'Where significant gaps in the state of knowledge exist, a plan and protocol should be developed to improve the assessment.'</i> What should be included in the assessment is not listed so identifying the gaps is an unknown.
Bellevue	WWA Phase II	Comprehensive Stormwater Planning (WWA)	20	S5.C.1.c.ii.(e) Recommend expanding the duration of long-term items from 7-20 years to 7-50 years.
Bellevue	WWA Phase II	Education and Outreach	20	S5.C.2 How do we measure the 'Effect' in the second bullet?
Bellevue	WWA Phase II	Education and Outreach	21	S5.C.2.a "The program design must be based on local water quality information..." Please define "Local". Can regional studies be used? What about topics where we think there may be an issue but have little research or information such as roof moss cleaning?
Bellevue	WWA Phase II	Education and Outreach	22	S5.C.2.1.(c) Clarify expectations or better define a 'strategic schedule'.
Bellevue	WWA Phase II	Education and Outreach	23	S5.C.2.a.ii.(b) "...each permittee shall conduct a new evaluation of the effectiveness of the ongoing behavior change program." Can the language be changed to "new or ongoing behavior change"? As a result of our last evaluation, we discontinued the program (fund raising car wash kits) and will be targeting a new behavior change.
Bellevue	WWA Phase II	Mapping and Documentation (WWA)	26	S5.C.4.a.v.(b) How far reaching outside the MS4 are 'Associated drainage areas' defined?
Bellevue	WWA Phase II	IDDE	28	S5.C.5.a Consider changing the word 'must' to 'may' in the second paragraph of minimum, performance measures.
Bellevue	WWA Phase II	Operations and Maintenance	38	S5.C.7 Suggest adding a compliance clause similar to inspections with compliance achieved at 95% of those identified for maintenance as being completed.
Bellevue	WWA Phase II	Operations and Maintenance	49	S5.C.7.e "Each permittee shall implement and document all practices..." Can you better define what documentation for this looks like?
Bellevue	WWA Phase II	Source Control Program (WWA)	52	S5.C.8.b.i "Operational source control BMP's must be required for all pollutant generating sources. Structural source control BMP's, or treatment BMP's/facilities, or both must be required for pollutant generating sources if operation source control BMP's do not prevent illicit discharges..." This could be a potentially large cost to businesses/property management companies that have older properties when Stormwater standards weren't what they are today. Has Ecology quantified the cost of this to the business community?
Bellevue	WWA Phase II	N/A		Align the permit term to match the calendar year. Cities do not operate on an August to August schedule...