

Phase I, WW Phase II, and EWA PH II Formal Draft Comments						
Document	Name		Section	Page	Comment	Name
WWA Phase II			Comprehensive Stormwater Planning (WWA)	18	S5.C.1.b - Low Impact Development Code Related Requirements. Relocate this language to Section S5.C.6., where the LID requirements were located in the 2013 permit (Controlling Runoff from...) or please explain how this Low Impact Development section pertains to the Comprehensive Stormwater Planning section.	Issaquah
			IDDE	33	S5.C.5.g. - Recordkeeping: <i>"In the annual report, each permittee shall submit data for all of the illicit discharges, including spills and illicit connections that were found by, reported to, or investigated by the Permittee during the previous calendar year."</i> If the city is electing to submit all IDDE's through the WQWebIDDE portal after each occurrence, then would the city be required to "resubmit" them again at the year end? In addition, some IDDE's will require a separate ERTS notification and possibly even a S4.F.1 on top of the city's internal tracking software. This is a potential huge administrative task. The city would like Ecology to consider streamlining/ merging their reporting requirements.	Issaquah
			Source Control Program (WWA)	53	S5.C.8.b.iii.(c) - <i>"Each Permittee shall inspect 100% of sites identified through legitimate complaints."</i> Please give guidance how legitimate complaints for Source Control would differ from our IDDE responsibilities (responding, reporting, etc.) in section S5.C.5 of the permit.	Issaquah
			Education and Outreach	23	S5.C.2.a.ii.c - <i>"Based on the evaluation from S5.C.2.a.ii.(b), by February 1,2021, each Permittee shall follow social marketing practices and methods, similar to Community-Based Social Marketing ..."</i> Community-Based Social Marketing (CBSM) is a specific brand and method of social marketing and the permit should not require it for two central reasons: 1) Training or consulting services from this brand of social marketing is expensive; DOE should not require it, unless they plan to pay for all education and outreach staff to receive training or to provide funding for consulting services. 2) The permit should not endorse one type of social marketing brand over another. CBSM is a proprietary term. Require Social Marketing, not Community-Based Social Marketing.	Issaquah
			Operations and Maintenance	49	S5.C.7.e - <i>"Each Permittee shall implement and document all practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee"</i> Please advise on what sort of documentation you would like to see for these practices.	Issaquah