

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

| Name | Document | Section | Page | Comment |
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| Kitsap County | WWA Phase II | Comprehensive Stormwater Planning (WWA) | 17 | S5.C.1.a.i.(a) Please remove the following language " <i>on or before March 31, 2020, the Permittee shall describe how water quality and watershed protection were addressed during the 2013-2018 permit cycle in updates to the Comprehensive Plan (or equivalent) and in other locally initiated or state mandated long range land use plans that are used to accommodate growth, or transportation.</i> " from the permit. The reason for this request is that water quality updates for the comprehensive plan were not required under the previous NPDES permit and therefore do not apply; |
| Kitsap County | WWA Phase II | Comprehensive Stormwater Planning (WWA) | 17 | This section does not allow for or address an important pathway for water quality retrofits commonly referred to as opportunity based retrofits. Many Permittees look for opportunities to add on or partner with local non-stormwater CIP projects to include a water quality retrofits into the project in an effort to improve water quality in the area and reduce the costs of implementing a stand alone water quality retrofit. The process included in this section does not allow for water quality retrofits outside of the priority watershed or priority target area to count towards permit compliance. The County requests that a section be added to allow for these types of retrofits, as they are a more cost effective way of improving water quality in our region. |
| Kitsap County | WWA Phase II | Comprehensive Stormwater Planning (WWA) | 18 | S5.C.1.b. Low Impact development code related requirements. Please remove this language from the comprehensive stormwater planning section as it has nothing to do with the stormwater planning. Please move this to section S5.C.6., to coincide with where the LID requirements were located in the 2013 permit. |
| Kitsap County | WWA Phase II | Education and Outreach | 21 | S5.2.a. i. " <i>permittees shall annually select at a minimum one target audience and one subject area from either (a) or (b).</i> " Please clarify whether Ecology expects permittees to select a new audience and behavior annually, or can they select 1 from each for the duration of the permit period. |
| Kitsap County | | | 22 | S5.C2.a.i. Target audience is shown as a heading for item (a) and (b), then repeated next to item (b); suggest removing the text and keeping Target audience as the header for both. |
| Kitsap County | | | 22 | S5.C2.ii. (b) Behavior Change. " <i>no later than July 1, 2020, each permittee shall conduct a new evaluation of the effectiveness of the ongoing behavior change program.</i> " Please either provide clarification regarding "ongoing" behavior change. It is unclear whether ongoing refers to the behavior change that permittees were working on during the 2013 permit or whether it relates to a new behavior change. |
| Kitsap County | | | 24 | S5.C2.a.ii. Change Community Based Social Marketing to Social marketing. Social marketing is a broader term and includes several methods including CBSM. |
| Kitsap County | WWA Phase II | Public Involvement and Participation | 25 | S5.C.3. Public Involvement and Participation. " <i>each permittee shall post on their website their SWMP</i> " next sentence states, "all other submittals must be available to the public upon request." Recommend the use of consistent language, either use the term shall or must for both statements. |

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| Kitsap County | WWA Phase II | IDDE | 30 | S5.C.5. d.i. Suggest moving this last sentence " <i>These procedures may also include source control inspections</i> " to the new source control section of the draft permit. Source control inspections include more than field screening and source identification. |
| Kitsap County | WWA Phase II | Monitoring and Assesment | 63 | S8.A 1. " <i>permittees shall pay into the collective fund to implement regional small streams and marine nearshore status and trends monitoring in Puget Sound.</i> " Suggest an alternative to include a third option that would allow permittees to pay 50% of the annual fee into the collective fund and spend the remaining 50% on independent monitoring that supports local stormwater management actions and could potentially be used for effectiveness studies. This would enable permittees to identify whether their stormwater management actions are protecting or improving local waters in the jurisdiction. |
| Kitsap County | WWA Phase II | Monitoring and Assesment | 63 | S8 We agree with removing the 2012 permit conditions S8.A that required permittees to submit non-permit required monitoring information through their annual reports. |
| Kitsap County | | | 64 | S8.B Regarding the new requirement that permittees provide data for SAM effectiveness studies, we recommend that rather than being a permit requirement, SAM effectiveness study applications include information regarding data acquisition and commitments of support from other jurisdictions. The process would be similar to applying for a grant e.g. grant of regional or statewide significance (GROSS). |