

Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	Comment	Comment Made By
I-4.2 How UIC Wells are Regulated	https://ecology.wa.gov/programs/wq/grndwtr/uic/ - link is invalid with new website	City of Mukilteo
BMP T5.14: Rain Gardens	Using the same infeasibility criteria as those found in bioretention can be costly for smaller projects, especially when a Ksat value is required for infiltration infeasibility, and others that require a geotechnical professional to evaluate. However, the <i>Rain Garden Handbook</i> cites simpler tests as an acceptable alternative for a small project to evaluate infiltrative capacity. The City would like clarification that the tests outlined in the <i>Rain Garden Handbook</i> are acceptable evidence for MR#1-#5 projects.	City of Mukilteo
I-4.1 Introduction To Subsurface Infiltration (Underground Injection Control Wells)	The introductory language limits the regulation under the UIC program to those wells "that receive municipal stormwater runoff." Arguably, stormwater for private development in this scenario would never be part of the municipal stormwater. Is this the intent?	City of Mukilteo
BMP T5.17: Vegetated Roofs	In order to comply with MR9, please add applicable Maintenance Criteria for vegetated roofs to Appendix V-A: BMP Maintenance Tools.	City of Mukilteo
S440 BMPs for Pet Waste	Please remove the "Bury It" and "Compost It" as alternatives. There is extensive regional research that contraindicates these methods. Regional outreach campaigns have been built on vetted research and information that supports "bag it. trash it." as the preferred BMP. The proposed "Pet Potty Area" is problematic in that the graphic appears to recommend introduction of rainwater into a sanitary system. This would not be permissible to most sanitary systems.	City of Mukilteo