

Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	Comment	Comment Made By
S440 BMPs for Pet Waste	Northwest Marine Trade Association recommends Ecology clarify that this BMP is intended to be applied only to facilities whose primary purpose is pet or animal care. If S440 is applicable to other public facilities, its precise applicability should be clarified in order to allow for proper public comment. In addition, S440 should be revised in light of its applicability. For example, under "Applicable Operational BMPs", the second bullet point states: "Inspect and clean up outdoor areas where there may be pet waste prior to rain events." Common businesses open to the public do not have the staffing to implement this BMP given the frequency of rain events and public access. Also, the text does not define a rain event, which is critical given that rain can be sporadic without clearly constituting a new rain event. Ecology should also remove the BMP of requiring an agreement with residents. Businesses that are open to the public cannot be expected to distinguish between residents and non-residents. The inability to enforce such agreements encourages noncompliance.	Northwest Marine Trade Association
S452 BMPs for Goose Waste	Northwest Marine Trade Association suggests the following BMPs under S452 be categorized as Optional. The fifth Applicable BMP proposes that a business scare away geese by patrolling its property while varying the use, timing, and location of lasers, dog patrols, eyespot balloons, and scarecrows. The BMP further expects these measures "when [geese] are around." In order to implement that BMP as described would require nearly unlimited staffing for a facility --- like a marina or boatyard --- with open spaces attractive to geese. S452 also requires businesses to alter site lines to 30 feet to discourage geese. This requirement is not fair, reasonable, or practical for marinas and boatyards, because docks and other built structures cannot be both functional for their intended purpose and altered for this purpose. Finally, grass at a marina is a customer amenity. The Applicable BMP of not watering the grass at a facility does not encourage customer retention and should not be required.	Northwest Marine Trade Association