

Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	Comment	Comment Made By
I-3.4.2 MR2: Construction Stormwater Pollution Prevention Plan (SWPPP)	Additional Guidance for Element 3 states, "Flows leaving the site should not exceed 3 feet/second, if the discharge is to a stream or ditch." Does the 3 feet/second refer to velocity or quantity? The context implies quantity, therefore it should be 3 cubic feet/second. If it's velocity then the velocity from the conveyance system and the ditch or stream may be very different depending on the size of each. Please clarify.	Mark Maurer
I-4 UIC Program Administration and Design Guidelines	Since: 1) The regulatory construct of the Western Washington Municipal Stormwater permits refer to the SWMMWW; and 2) S2.A.1. of the Municipal Permits specifically state that: "Discharges to ground waters of the state through facilities regulated under the Underground Injection Control (UIC) program, chapter 173-218 WAC, are not authorized under this Permit.", introducing the UIC-related regulatory content into the SWMMWW content would mix regulatory frameworks and we advise against it so as not to introduce confusion to an already legally and technically complex regulatory construct. For example, any changes to the UIC rules triggering change to the SWMMWW which could, in turn, require amending the permit and all the public process that entails.	Mark Maurer
I-4.2 How UIC Wells are Regulated	This section states: "Since the NPDES Permit does not fulfill all the requirements of the UIC program, the following must be added to the jurisdiction's Stormwater Management Program (SWMP) and implemented:" However, S5 of the Western Washington Municipal Stormwater Permits (Municipal Permits), the section dictating the content of the SWMP, does not require such language. Furthermore, S2.A.1. of the Municipal Permits specifically state that: "Discharges to ground waters of the state through facilities regulated under the Underground Injection Control (UIC) program, chapter 173-218 WAC, are not authorized under this Permit." Thus, introducing the UIC-related regulatory content into the Municipal Permit's prescribed SWMP content would mix regulatory frameworks and we advise against it so as not to introduce confusion to an already legally and technically complex regulatory construct.	Mark Maurer
I-E.2 Stormwater Control Transfer Program Principles, Elements, and Guidelines	It seems to me that the last paragraph of the Section <i>Specific Technical Guidelines for Flow Control Improvement Transfer</i> , #7 should be at the beginning of #7 rather than the end. It was confusing to me to read this after reading the options above it because the last paragraph states the limitations and reasoning.	Mark Maurer
III-2.3 Single Event Hydrograph Method	Table 1-4.1 shows that Alderwood soil type is a hydrologic soil group C; however, USDA NRCS Web Soil Survey website lists it as a HSG B. Change the table entry to B instead of C.	