

<b>Comments on the Draft 2019 SWMMWW</b>		
<b>Draft 2019 SWMMWW Section (select from drop down)</b>	<b>Comment</b>	<b>Comment Made By</b>
I-2.4 Phase I and Western Washington Phase II Municipal Stormwater Permits	I-2.4 Phase I and Western Washington Phase II Municipal Stormwater Permits; Section S5.C.5 has created confusion that should be resolved. There have multiple comments made to MBAKS members about applications submitted during different time periods than expressed in a.i and a.ii Perhaps a new a.iii which would state that all other applications submitted will be reviewed with the stormwater regulations in effect at the time of complete application, as per RCW 58.17.170. Note: This change should be made to the Phase I, Western and Eastern Phase II draft permits.	Master Builders Association of King and Snohomish Counties
I-2.4 Phase I and Western Washington Phase II Municipal Stormwater Permits	I-2.4 Phase I and Western Washington Phase II Municipal Stormwater Permits; Section S5.C.8 While 8.a.ii states that the purpose of the Source Control for Existing Development is for "commercial and industrial properties", 8.1.iv discusses pesticides, herbicides, and fertilizer discharges which raises a concern that attempts to apply this program to existing subdivisions might occur. Suggestion; edit 8.a.i to include a statement such as "associated with existing land uses and activities." (see Appendix 8 to identify pollutant generating sources). This would clarify this program is limited to only those uses listed in Appendix 8.	Master Builders Association of King and Snohomish Counties
(General Comment)	Low Impact Development techniques are new and effective tools to manage stormwater. LID should be a market-based environmental solution. The tools that are available should be promoted and supported by DOE, rather than required. It is well known that each site is different, and many LID techniques may not be appropriate and desirable for a specific site. The requirement creates a disincentive and the where feasibility test encourages attempting to find the techniques are "not feasible" rather than attempting to find ways to implement effective LID techniques. The sequencing of LID techniques in the prescriptive path should be eliminated as it attempts to pre-select techniques - this should be left to the design engineer.	Master Builders Association of King and Snohomish Counties
BMP T5.30: Full Dispersion	Disappointed to see text not allowing full dispersion areas within critical area buffers, such as wetland and stream buffers. Was this note really meant to only apply to slope buffers without geo-review? If the goal is to promote full dispersion areas retained in forest and native vegetation, why not grant this flexibility?	Master Builders Association of King and Snohomish Counties
Glossary	Adjacent Steep Slope - A slope of 15 percent within 500 feet of the site. This definition needs to be tightened up. First a 15% slope is not very steep at all. Much of western Washington is greater than 15%. Secondly there should be a vertical grade change tied to it. For example slopes over a certain percentage and with a grade change of least 10 feet. Lastly the steep slope could be upstream of the site and per the definition there is an adjacent steep slope. Shouldn't the definition be if the slope is downstream of the site?	Master Builders Association of King and Snohomish Counties
III-2.2 Continuous Simulation Models	Page 508 last bulleted item under Vegetation data. This paragraph seems to conflict with the last paragraph on page 509 in how BMP T5.13 areas are handled. If the area is on the project site areas that have used BMP T5.13 can be modeled as pasture and don't need to be set aside with legal restrictions.	Master Builders Association of King and Snohomish Counties
III-2.2 Continuous Simulation Models	We are very concerned and disappointed to see that MGS Flood is no longer approved for use. In our experience, MGS Flood gives superior results. It is quicker to run iterations in MGS Flood with iterations taking seconds versus minutes or hours in WWHM.	Master Builders Association of King and Snohomish Counties
I-3.4.7 MR7: Flow Control	Figure 1-3.4: basins with 40% Total Impervious Area as of 1985- More detail on this map would be useful to determine if a project is within the limits of the Basins with 40% Total Impervious Area as of 1985	Master Builders Association of King and Snohomish Counties