

Annual Reporting Ad Hoc Committee

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General Concerns and Comments – Annual Report Ad Hoc Committee

AR Q	Issues / Rational	Desired Outcome	Comments / Permit Language	Propose AR language
Overall	<p>Does the question provide information that Ecology or the permittee can use / build on? Examples: PII 44 - Why is this question still being asked/what does it actually tell you about permit implementation / performance?</p>	<p>Questions provide information that Ecology or the permittee can use / build on. Please be thoughtful around asking numbers. When asking for numbers, Ecology meet the objectives identified in their Response to comments list of objectives. E.g., "Gather meaningful quantitative information statewide."</p>	<p>2019 Response to comments Starting pdf pg. 200 Ecology's goal is to get comparable answers that help gauge compliance across jurisdictions. Ecology applies the following list of objectives when developing the draft Annual Report appendices:</p> <ul style="list-style-type: none"> ▪ Track the compliance status of Permittees. ▪ Gather information to improve Permits. ▪ Identify needs for technical assistance. ▪ Identify successful outcomes of program for the public. ▪ Help Permittees coordinate internally. <p>Gather meaningful quantitative information statewide.</p>	<p>Eliminate questions where possible if they do not meet the "Ecology objectives list" – See Comments Column.</p>
Overall	<p>Question that might create Negative response even though permittee is fully complying. Examples: 1. Phase II Q 61. Could imply noncompliance if alternative approach used and permittee answers "no" to question. 2. Phase II Q 63.</p>	<p>Pose question in a way that avoids "No" as an answer indicating full compliance.</p>		<ol style="list-style-type: none"> 1. Add an "approved schedule" option to the yes/no options. 2. Eliminate question (not in Phase I). Permit does not actually require that we inspect ALL so if keep, revise so that can answer yes (if inspect at least 95% of facilities) <p>61. Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b).</p> <p style="padding-left: 40px;">61a. If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i(b).</p> <p>Or</p> <ol style="list-style-type: none"> 61. Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b) <u>completing the 95% or required inspection criteria or using an appropriate alternative approach?</u> 63. Annually inspected all municipally owned or operated stormwater treatment and flow control BMPs/facilities, <u>completing the 95% or required inspection criteria or using an appropriate alternative approach?</u> (S5.C.7.c.i)
Phase II Q 4 / 4a	<p>Creates confusion for responder and for external reviewers. Negative wording is awkward and potentially confusing.</p>	<p>Update Annual Report questions to create a clear understanding of compliance. Can the question be a simple yes / no?</p>		<p>Make question more direct</p> <ul style="list-style-type: none"> • ".. describe internal coordination strategies to ensure permit compliance"

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		Or have a simple demonstration of compliance question? Make question more direct, something like" describe internal coordination strategies to ensure permit compliance"		<ul style="list-style-type: none"> Or combined 4 and 4a. Just describe how permittee complied. Or just answer "yes" and leave off description if description doesn't add value. And / Or strike "eliminate barriers" (recast in positive e.g., "facilitate")
S9. A.	3/31 doesn't allow internal jurisdiction enough review time of Annual Report, attachments and the Stormwater Management Plan.	Annual Report date moved to 5/31.	S9.A. No later than March 31 of each year Data collection from across the jurisdiction can extend into February. Upper management / council review can take up to 4 weeks.	S9. A. No later than May 31 31 of each year beginning in 2025 0
PI 47 PII 78	Annual report question adds requirements to the permit requirements. Because the question was not anticipated, information may not be collected for the reporting period.	Review permit conditions and associated AR questions to ensure that questions are consistent with stated requirements. Line up question with permit requirements.	For reference – Phase II Q78. Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the number of times each business was inspected and if enforcement actions were taken.	78. Attach a list of inspections, per S5.C.8.b.iii, organized by the business category , noting the number of times each business was inspected and if enforcement actions were taken. Change to: 78. Attach a list of inspections, per S5.C.8.b.iii, noting the number of times each business was inspected and if enforcement actions were taken. PI – for reference: 47. Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the number of times each business was inspected, and if enforcement actions were taken.
Ph I Q5 Ph 1 Q13 Ph II Q30	Questions that require a one-time response should be eliminated from the online form once completed. One and done. Creates confusion if kept in question later Annual Report.	Eliminate question if a required submittal indicate that work was completed. Or Remove question from AR when Deadline passed. Or Add "previously submitted" or "not yet required" answer option.	PI 5. Collected outfall size and material in accordance with S5.C.2.b.i? (Required to begin no later than January 1, 2020) 5a. Attach a spreadsheet that lists the known outfalls' size and material(s). (Begin reporting March 31, 2021) PII 30. Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020) 30a. Attach a spreadsheet that lists the known outfalls' size and material(s). P1 13. Submitted draft enforceable requirements, technical standards, and manual to meet site and subdivision-scale requirements of S5.C.5.a to Ecology no later than July 1, 2020. (S5.C.5.b.iii)	Examples PI 5. And 5a. – Eliminate Question 5. And Question PII 30. P1 13 Eliminate question or add a "previously submitted" option. Or Change language to: Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.5.b.iv.

MS4 Mapping and Documentation Comments

AR Q	Issues	Desired Outcome	Comments / Permit Language	Propose AR language
Ph I Q5 Ph II Q30	Deadline met, remove question to prevent confusion.	Add to list per S5.C.a. and strike as stand-alone question	5. Collected outfall size and material in accordance with S5.C.2.b.i? (Required to begin no later than January 1, 2020) 30. Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)	5. Collected outfall size and material in accordance with S5.C.2.b.i? (Required to begin no later than January 1, 2020) 30. Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)
Ph I Q5a Ph II Q30a	What is the value of this report? How is it used? Minor changes create confusion and audit issues. Permit question doesn't line up with Annual Report Questions.	1. Request once per permit cycle instead of annually. 2. Align Annual Report requirement with permit language. See Outfall Ad Hoc group for recommendations.	This information is available via "electronic map" required by the permit per request by Ecology (PI S5.C.2.d. / P II S5.C.4.d. From 2019 Response to Comments Q. 5.a - Why is it necessary for Permittees to submit a spreadsheet of outfall data, vs another format of submittal? Response to range of comments Ecology is requesting this format of submittal for ease of review.	See Outfall Ad Hoc group for recommendations.
Ph I Q6 Ph II Q31	Replying N/A to this question creates concerns for external reviewers.	Clarity in interpreting and responding to the question	6. Completed mapping of known connections from the MS4 to a privately owned stormwater system S5.C.2.b.ii? (Required no later than August 1, 2023) 31. Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)	Eliminate "completed" and revise to say "maintained". OR Eliminate question since permit requires maintenance. OR PI Q6 / PII Q31. Mapped known connections from the MS4 to a privately owned stormwater system S5.C.2.b.ii? (Completion required no later than August 1, 2023).
Ph I Q7 Ph II Q32	Replying N/A to this question creates concerns for external reviewers.	Clarity in interpreting and responding to the question	7. Counties only: Mapped conveyances as described in S5.C.2.a.v for 50% of areas outside the urban/higher density rural sub-basins, as described in S5.C.2.b.iii? (Required by December 31, 2023) 32. Developed an electronic format for map, with fully described mapping standards in accordance with S5.C.4.c? (Required no later than August 1, 2021)	Eliminate questions that are complete in the following year.

Controlling Runoff from New Development, Redevelopment and Construction Sites

AR Q	Issues / Rationale	Desired Outcome	Comments / Existing Permit Lang	Propose AR language
Ph 1 Q13	One and done questions create confusion in later Annual Reports.	<p>Options: Align Phase I and II requirements and AR questions. Replace with PII Q43.</p> <p>Eliminate question for annual reporting in AR 2021 and beyond. Or Add option "Requirement previously met".</p>	Submitted draft enforceable requirements, technical standards, and manual to meet site and subdivision-scale requirements of S5.C.5.a to Ecology no later than July 1, 2020. (S5.C.5.b.iii)	<p>Submitted draft enforceable requirements, technical standards, and manual to meet site and subdivision-scale requirements of S5.C.5.a to Ecology no later than July 1, 2020. (S5.C.5.b.iii)</p> <p>Remove "one and done" questions consistently. Or Change language to: Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.5.b.iv.</p>
Ph II Q43	Clarity. Discern the difference between 43 and 44.	Change to "continue to implement".	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.	"Continued to implement" ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.
Ph II Q44	<p>One and done questions create confusion in later Annual Reports.</p> <p>The confusing aspect of 43 and 44 is that they appear to be asking a question aimed at determining compliance with the exact same permit condition and that there seems to be an unstated distinction in how or whether new permittees versus previous permittee should answer. Aside from this, both of these questions would only be answered once during the permit cycle.</p>	<ul style="list-style-type: none"> Reduce number of questions with a simple response of what was done. Avoiding "no" responses when in compliance. Create clarity. 	<p>PHI: Adopted or updated, and made effective, the Ecology-approved enforceable requirements, technical standards, and manual to meet site and subdivision-scale requirements of S5.C.5.a no later than July 1, 2021? (S5.C.5.b.iv)</p> <p>PHII: Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022)</p>	<p>Only ask question in year the requirement is due. Or see edits proposed for Q44a. restate to ask for code citation, only, including date of adoption.</p> <p>Remove Question 44 if you restate 44a as proposed. See next line / Question 44a.</p>
PII 44a	<p>Does the response to this question provide information that Ecology or the permittee can use/build on? What does it actually tell you about permit implementation / performance</p>	<ul style="list-style-type: none"> Reduce the number of questions Provide information on permit implementation / performance 	<p>44. Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022)</p> <p>44a. Cite code reference in <i>Comments</i> field.</p>	<p>Convert both questions into a single question:</p> <p>Cite code reference in <i>Comments</i> field where ordinances or other enforceable mechanisms to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. were updated.</p> <p><input type="checkbox"/> Adopted by June 30, 2022. [Y/N]</p> <p>Or Date of adoption: _____</p>

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P I 18 Ph II Q 48	<p>Create consistency between Phase I & II annual report questions.</p> <p>The order of questions 48 and 48a often require a “no” answer.</p>	Clarity to facilitate permit compliance.	<p><i>48a If no, inspected prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)?</i></p>	<p>Make consistent with Phase I permit which states Q 18. Inspected, prior to clearing and construction, permitted development sites per S5.C.5.b.vi(b)?</p> <p>Q 48 Inspected prior to clearing and construction, all construction sites meeting the minimum thresholds permitted development sites per S5.C.6.c.ii?</p> <p>Q 48a If no, inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 ...</p>
Ph I Q 20 Ph II Q 49b	<p>Coordinate with SWM group.</p> <p>Question difficult for fully developed jurisdictions.</p> <p>Changes could result in additional requirements.</p>		<p>Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months, per S5.C.5.b.vi(d)?</p> <p>PII 49 ... per S5.C.6.c.iv?</p>	<p>“If applicable,” inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months, per S5.C.5.b.vi(d)?</p> <p>Add answer options: Yes / No / NA</p> <p>Maintain comment field for additional information.</p>

AR Q	Issues / Rationale	Desired Outcome	Comments / Existing Permit Lang	Propose AR language
Ph I Q 21 Ph II Q 50	<p>Question does not clarify whether permitted development sites need to meet certain thresholds/Minimum Requirements.</p> <p>Separate Annual Report questions to line up with specific permit requirements where appropriate.</p> <p>E.g., P II Q 50 & 51 – its not clear if these two questions apply to the same set of BMPs.</p>	<p>Reword for clarity. Review permit language. "permitted development" vs. "sites that meet appendix 1". Change the permit language if necessary.</p> <p>Coordinate with SW Management Manual of Western Washington Ad Hoc group.</p>	<p>Inspected permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of stormwater facilities, per S5.C.5.b.vi(e)? P II 50 ... (S5.C.6.c.v)</p>	<p>Inspected permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of stormwater facilities ...</p> <p>If stormwater facilities refer to stormwater treatment and flow control BMPs / facilities, please update permit and annual report language as appropriate.</p> <p><i>Definition - Stormwater Treatment and Flow Control BMPs/Facilities means detention facilities, permanent treatment BMPs/facilities; and bioretention, vegetated roofs, and permeable pavements that help meet minimum requirement #6 (treatment), #7 (flow control), or both.</i></p> <p>Please clarify what a "stormwater facility" is for this question. Does a stormwater facility include onsite stormwater management (MR 5) BMPs? Or is Ecology asking for MR 6 & 7?</p> <p>This change could require permit condition requirement edits to match AR question. Also impacts O&M permit requirements.</p>
Ph I Q 22 Ph II Q 51	<p>Question does not clarify whether permitted development sites need to meet certain thresholds/ Minimum Requirements.</p> <p>Consistency with Phase I and II.</p>	<p>Reword for clarity. Review permit language. "permitted development" vs. "sites that meet appendix 1". Change the permit language. Coordinate with SWM group. Ask ecology for clarification. Which facilities do you want inspected? Have the Phase II language match the Phase I.</p>	<p>Verified that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities prior to final approval and occupancy being granted? (S5.C.5.b.vi(e))</p> <p>Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)</p>	<p>For Phase II permit</p> <p>Verified that a maintenance plan is completed and responsibility for maintenance is assigned for stormwater treatment and flow control BMPs/facilities prior to final approval and occupancy being granted?</p> <p>Or</p> <p>Replace the word "projects" with "all applicable permitted development sites".</p>
Ph I Q 25 Ph II Q 54	<p>Add: "link to" since we are no longer required (nor able) to provide the NOIs directly</p>		<p>Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.5.b.vii)</p>	<p><i>PI Q 25 PI Q 54</i> <i>Make link available for Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.5.b.vii)</i></p>

Low impact development

AR Q	Issues / Rational	Desired Outcome	Comments / Permit Language	Propose AR language
PI 37 PII 16	<ul style="list-style-type: none"> This question (and Permit Requirement) seems to require municipalities to require Macroscale LID development. It is not clear in the Question (or the Permit Conditions) what the relationship and interface with the Microscale LID requirements encountered in MR5 during development review. “Barriers” is a negatively framed question that could create confusion about what information is actually needed here. 	<ul style="list-style-type: none"> Clarity Remove negative worded responses that imply noncompliance. 	<p>37. From the assessment described in S5.C.6.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs.</p> <p>37a. If yes, describe the barrier and the measures taken to address them.</p> <p>16. From the assessment described in S5.C.1.c.i(a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)</p> <p>16a. If yes, describe the barrier(s) and the measures taken to address them. (S5.C.1.c.i(a))</p>	<p>Proposed language for Q PI 37 and PII 16. Continued implementation of program and policies designed to make LID the preferred and commonly used approach to stormwater management when updating, revising, and developing new local development-related codes, rules, standards, or other enforceable documents.</p> <p>Provide an attachment of efforts to improve LID implementation if necessary.</p>

IDDE

AR Q	Issues/Rational	Desired Outcome	Comments / Permit Language	Propose AR Language
Ph1 49, Ph II 34		Change language	<p>49. Continued to implement regulatory mechanisms to effectively prohibit illicit discharges into the MS4, per S5.C.9.b</p> <p>34. Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.</p>	PII Q 34. <u>Continue to implement...</u>
Ph1 51, Ph2 37	<ul style="list-style-type: none"> Challenging question since some areas may be screened multiple times. May not be getting information ECY is seeking Clarity 	Delete question or reword	<p>PI</p> <p>51. Provide the percentage of MS4 screened in reporting year, per S5.C.9.c.i(a). (Required to screen on average 12% each year)</p> <p>51a. Cite field screening techniques used to determine percent of MS4 screened.</p> <p>52. Percentage of total MS4 screened from permit issuance through the end of the reporting year? (S5.C.9.c.i(a))</p> <p>PII</p> <p>37. Percentage of total MS4 screened from permit issuance through the end of the reporting year. (S5.C.5.d.i.)</p>	<p>Change permit language to read:</p> <p>51/37. Did you track total percentage of MS4 screened? By July 31, 2024, did you complete screening of 12% of the MS4 for the 5-year permit term.</p> <p>51/37. a. Cite field screening techniques?</p>

			<p>Percentage of total MS4 screened from permit issuance through the end of the reporting year? (S5.C.9.c.i(a))</p> <ol style="list-style-type: none"> 1. Percentage screened for year. 2. Average percentage of MS4 screened from permit issuance through the end of the reporting year. (S5.C.5.d.i.) Note: An average 12% of the MS4 must be inspected must be completed for the 5-year permit cycle. 	
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Operation and Maintenance

AR Q	Issues/Rational	Desired Outcome*	Comments / Permit Language	Propose AR Language
PI Q 63, P II Q 60	Ordinance has already been implemented.	Revise Phase II AR question per Phase I AR question	<p>PI</p> <p>63. Evaluated and, if necessary, updated the existing ordinances or other enforceable documents requiring maintenance of all stormwater treatment and flow control BMPs/facilities (including catch basins that are part of the facilities) regulated by the Permittee? (S5.C.10.b.i)</p> <p>63a. If updated, cite ordinance or other enforceable document.</p> <p>P II</p> <p>60. Implemented an ordinance, or other enforceable mechanisms, to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(a)?</p>	Update Annual Report question for 2024. See PI Question 63 for potential language.

AR Q	Issues / Rational	Desired Outcome	Comments / Permit Language	Propose AR language
P I 64, P II 61	Some jurisdictions are on alternative inspection schedules so cannot say the “annually” inspect. Overall – Negative wording for Phase II. Could imply noncompliance.	Revise per P I Q64. Or Add an “approved schedule” Comments don’t show up in Paris or AR print out.	PI 64. Implemented an ongoing inspection program for stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.10.b.ii? P II 61. Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b). 61a. If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i(b).	Does Ecology’s allow multiple choice responses? For example: How did you comply with this specific requirement? Answer options a, b and c. Or PI / PII 64. / 61. Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee or used reduced inspection frequency per S5.C.7.b.i(b). for the first time during this permit cycle If using a reduced inspection frequency attach documentation per S5.C.7.b.i(b).

AR Q	Issues / Rational	Desired Outcome	Comments / Permit Language	Propose AR language
P I Q 67, P II Q 63	Strike for Ph II? Permit does not actually require that we inspect ALL so if this question is kept, revise so that Permittees can answer yes when compliant with the Permit (if inspecting at least 95% of facilities).	Change to match Phase I Questions	<p>P I</p> <p>67. Number of known stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee? (S5.C.10.c.i)</p> <p>67a. Number of stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee inspected during the reporting period? (S5.C.10.c.i)</p> <p>67b. Number of stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee for which maintenance was performed during the reporting period? (S5.C.10.c.i)</p> <p>P II</p> <p>63. Annually inspected all municipally owned or operated stormwater treatment and flow control BMPs/facilities? (S5.C.7.c.i)</p> <p>63a. Number of known stormwater treatment and flow control BMPs/facilities owned or operated by the Permittee.</p> <p>63b. Number of facilities inspected during the reporting period.</p> <p>63c. Number of facilities for which maintenance was performed during the reporting period.</p>	Change Phase II Questions to match Phase I Questions
P I Q73, P II Q 68		Combine Qs Phase II 68 and 69 into one question Delete Phase I Q 74, 74a and Phase II Q 69, 69a once deadlines are met.	<p>P II</p> <p>68. Implemented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d)</p> <p>69. Documented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d – Required by December 31, 2022)</p> <p>69a. Cite documentation in <i>Comments</i>.</p> <p>P I</p> <p>74. Documented practices, policies, and procedures to reduce stormwater impacts per S5.C.10.e? (Required by December 31, 2022)</p> <p>74a. Cite documentation in <i>Comments</i>.</p>	Change to wording to read “ <u>Continue to</u> implement the documented practices...”

Source Control Program for Existing Development

AR Q	Issues / Rationale	Desired Outcome*	Comments / Permit Language	Propose AR language
PII 73	Adoption of ordinances completed by 2022	Change to "Implemented" for next permit cycle		73. Implemented ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources ..
PI 45a PII 74	Simplify question for next cycle.	Only ask # of sites in updated inventory Reduce the number of questions		74. Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022) 74. Number of total sites identified for the inventory.
PII 75	Question not needed in upcoming permit cycle--since the summary will show actions taken, and table will list actual inspection data	Eliminate question	Replace with Question 77.	Q 75. Implemented a progressive enforcement policy per S5.C.8.b.iv. (Required by January 1, 2023)
PII 76	Eliminate or change to "continued to implement".		76. Implemented a progressive enforcement policy per S5.C.8.b.iv. (Required by January 1, 2023)	76. Continued to implement a progressive enforcement policy per S5.C.8.b.iv.
PII 77	Eliminate unnecessary questions that can be answered by other questions.	Use this in lieu of Q75 above for Ph II.		Q 75. Implemented a progressive enforcement policy per S5.C.8.b.iv. (Required by January 1, 2023) Q 75. Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv.
PI 47 PII 78	1. A desire to compare data regionally. 2. Similar to the previous recommendation, a consistent reporting convention is needed in order to compare and summarize efforts region-wide.	1. Have permittees (I & II) use comparable business categorization to allow apples to apple comparison to better id pollutant sources. 2. Avoid an Ecology mandated database for Source Control.	Enforcement Inspections need to meet a % of total sites. Regional category approach? <ul style="list-style-type: none"> Guidance or BIG could address. Ongoing Herrera / WSU Source Control group?? Commercial, Industrial, Institution, multi family, other complaint based described in the permit. 	Q 78. Attach a list of inspections, per <i>PI or PII reference</i> , organized by the business category and <u>SIC or NAICs code where possible</u> , noting the number of times each business was inspected and if enforcement actions were taken.

AR Q	Issues / Rational	Desired Outcome	Comments / Permit Language	Propose AR language
PI 47 PII 78	Permit language and AR question don't match.	<p>Consolidate recordkeeping for this permit element and question.</p> <p>Have permittees (I & II) use comparable business categorization to allow apples to apple comparison to better id pollutant sources.</p>	<p>PI AR Question 64. Attach a summary of actions taken to implement the source control program, per S5.C.8.b.iii and S5.C.8.b.iv vi.</p> <p>P II 77. Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv vi.</p>	<p>Permit language edit – consolidate recordkeeping element.</p> <p>Current Permit Language S5.C.8. iv (c) Each Permittee shall maintain records, including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records, demonstrating an effort to bring sites into compliance. Each Permittee shall also maintain records of sites that are not inspected because the property owner denies entry.</p> <p>Create new permit language: “S5.C.8. vi. Recordkeeping (a) Each Permittee shall maintain records, including documentation of each site visit, inspection reports, warning letters, notices of violations, and other enforcement records, demonstrating an effort to bring sites into compliance. Each Permittee shall also maintain records of sites that are not inspected because the property owner denies entry.</p> <p><u>Organize by businesses and/or activities with potential outdoor pollutant-generating sources that discharge to the MS4. Standard Industrial Code (SIC), Major Group, and NAICS numbers can be provided for reference.”</u></p>