

| PRELIMINARY DRAFT TOPIC (select from drop down) | Comment | Comment Made By |
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| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | <p>Regulatory/Permit Reference: Appendix 1, Section 1 Exemptions</p> <p><u>Pavement Maintenance Projects</u> The exemptions described below may only be applied to an entire project. The entire project must be for the sole purpose of maintaining a pavement area. Pavement maintenance projects do not involve redevelopment work beyond the pavement maintenance. Pavement maintenance projects do not change the characteristics of a roadway (e.g., changing a four-way intersection to a roundabout is not a pavement maintenance project). Larger redevelopment projects that include pavement maintenance components must consider the pavement maintenance areas as new or replaced hard surfaces, as directed by the definitions in the Glossary.</p> <p>Comment: Pavement maintenance is limited to a defined set of activities that address a discrete area of damaged pavement. The purpose of pavement maintenance is to restore the original function of the pavement and does not alter stormwater runoff characteristics or change the use of the land. Often, the repair of damaged areas of pavement are incorporated into larger projects due to cost savings for mobilization, materials/supplies, etc.</p> <p>The stormwater impact for pavement maintenance is no different whether the pavement maintenance is completed as a standalone project or incorporated into a larger project. As such, the exemption should apply to any pavement maintenance practice and not just an entire project that is completed exclusively for pavement maintenance. The review process for development/redevelopment projects completed by the applicable jurisdictional authority includes the review and approval of the pavement maintenance exemption and would address any potential to use the pavement maintenance exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p>Suggested Revision: <i>The existing language is included for Pavement Maintenance Practices in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1.</i></p> <p>Retain the existing language for the Pavement Maintenance Practices exemption with clarification that new and/or expanded impervious area does not qualify for the exemption.</p> <p>Alternatively, if the language will be modified, it should be clarified that the Pavement Maintenance Exemption can always be applied to redevelopment projects for the specified list of Pavement Maintenance Activities, but that the exemption would not apply to new development projects.</p> | Port of Seattle |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | <p>Regulatory/Permit Reference: Appendix 1, Section 1 Exemptions</p> <p><u>Underground Utility Projects</u> This exemption may only be applied to an entire project. The entire project must be for the sole purpose of maintaining or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench). Underground utility projects do not involve redevelopment work beyond the utility work. Larger redevelopment projects that include underground utility components must consider the underground utility work as new or replaced hard surfaces, as directed by the definitions in the Glossary.</p> <p>Comment: Underground utility projects are limited to a defined set of activities to install, modify, upgrade or remove underground utilities. The purpose of underground utility projects is to provide utilities or to restore the functionality of utilities and does not alter stormwater runoff characteristics or change the use of the land. Often times, the installation, modification, upgrade, or removal of underground utilities are incorporated into larger projects due to cost savings for mobilization, materials/supplies, etc.</p> <p>The stormwater impact for underground utility projects is no different whether the underground utilities are completed as a standalone project or incorporated into a larger project. As such, the exemption should apply to any activity involving the installation, modification, upgrade, or removal of underground utilities and not just an entire project that is completed exclusively for underground utilities. The current review process for development/redevelopment projects includes the review and approval of the utility facility exemption and would address any potential to use the utility facility exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p>Suggested Revision: <i>The existing language is included for Underground Utility Projects in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1.</i></p> <p>Retain the existing language for the exemption for Underground Utility Projects, including projects to install new utilities.</p> <p>Alternatively, if the language will be modified, it should be clarified that the Underground Utility Projects Exemption, including the installation of new utilities, can always be applied to redevelopment projects if the exemption criteria are met, but that the exemption would not apply to new development projects.</p> | Port of Seattle |

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| MS4 Permit: Mapping | <p>Permit Reference: Phase I Municipal Stormwater Permit, Outfall Mapping Requirements</p> <p>Comment 1: To support tracking elevation and horizontal accuracy, consider including a greater number of options for the collection method instead of the coordinate accuracy ranges. It's typical for users to assume an accuracy of collection based on very little information outside of the collection method itself. Relying on users to always estimate the accuracy of a collection type correctly means that data isn't standardized. For example, all data collected with a sub-meter GPS unit should have +/- 3'. If "Sub-meter GPS" is an option for collection method, then it should not be possible for a user to enter +/- 40' or +/- 0.1' for that collection method. Moving to this model would mean that accuracy is more reliable across the jurisdictions included.</p> <p>Suggested Revision 1: Consider not requiring elevation and horizontal accuracy.</p> | Port of Seattle |
| MS4 Permit: Mapping | <p>Permit Reference: Phase I Municipal Stormwater Permit, Outfall Mapping Requirements</p> <p>Comment 2: To support tracking of material type, consider allowing a greater number of options or not requiring a valid value list. Typically, jurisdictions track many more material types than the three provided, plus "Other." Requiring jurisdictions to remap the material types they track into the categories provided would be an additional step that only serves to diminish the wealth of data being collected.</p> <p>Suggested Revision 2: Consider allowing a freeform entry for material type.</p> | Port of Seattle |