

King County Comments on Preliminary Permit Draft SSC requirements:

Appendix 12:

- Recommend limiting the sweeping requirement to curb and gutter roadway segments with direct discharges to receiving waters. This seems reasonable until/unless an additional benefit can be shown from sweeping other road types.
- Recommend providing a broader option in the permit to define HPGAs “using locally derived information” which would allow jurisdictions to use rapidly developing information on things like 6-PPD-q distribution relative to the roadway and traffic attributes. This alternative to determining (HPGA) – areas could include projects that drain to Superfund designated receiving water, areas with arterials (or AADT > 25,000), or areas with >50% commercial/industrial or high-density developed land use OR areas where local information indicates a high pollution potential.
- Recommend including a definition of arterials.
- Recommend including a definition of “areas with >50% commercial/industrial or high density developed land use”.
- Recommend example steps for how permittees would qualify for SSC credit by implementing a “Watershed collaboration” project.
- Recommend removing "Projects that do not have a nexus with the current MS4 or do not prevent future MS4 impacts. " under “Non-Qualifying Projects, as this language adds a limitation that is not consistent with S5.C.7 and may not be consistent with listed SSC restoration and acquisition project types.
- Recommend language change for defining when points should be given for overburdened communities. We suggest that this apply to "projects which are in benefit overburdened communities" as well as projects that are in both design and construction status.