

Pierce County's Comments on the Structural Source Control preliminary permit language.

Pierce County has provided input through the PAC involvement. We have a few additional comments on the preliminary proposed language.

Issue	Recommendation
<p>The County would like clarification on the maintenance requirements of SSC's. The O&M section of the permit specifically identifies maintenance of stormwater treatment and flow control bmp's/facilities', but not stormwater retrofit facilities. The county maintains all of our facilities as if they fall under the former definition but would like clarification in general.</p>	<p>under relevant sections in the O&M sections, add clarity that maintenance requirements apply to retrofit facilities as well.</p>
<p>We are supportive of keeping a split of points between design and construction and would appreciate a similar split in future permit cycles. Planning is not linear, and this gives some flexibility and 'cushion' for unanticipated delays in construction.</p>	<p>Keep a design/construction split.</p>
<p>We are supportive of the simplified calculation and reporting process for smaller projects.</p>	
<p>We are supportive of the new opportunity for point accrual for watershed collaboration. We would like clarity on the right way to annotate collaboration with a non-permittee, or a secondary permittee. How would Ecology accept a split of points in those situations?</p>	<p>For simplicity we recommend that Ecology specify the use of percentage of the area treated in the Permittee's jurisdiction.</p>
<p>The county is concerned with the change in multipliers. The SSC white paper did not give scientific basis for a change in these multipliers. This change moves the basis of the multipliers away from being correlated with stormwater benefits, and further towards an Ecology-lef prioritization of project types.</p>	<p>Provide recommendations on how permittees should rectify conflicting priorities from Ecology.</p>
<p>We are also required by the permit to have our own prioritization process for projects. In practice, this permit cycle's proposed prioritization works for the County. But, how are we expected to rectify if, in the future, those priorities compete? This is a very real possibility with the County's salmon recovery and habitat restoration efforts.</p>	