

## City of Seattle Comments - Preliminary Draft of Structural Stormwater Controls Program

### Phase I Municipal Separate Storm Sewer (MS4) Permit

3/23/2023

The City of Seattle (Seattle) appreciates the opportunity to review and comment on the preliminary draft Phase I Structural Stormwater Controls (SSC) Program language, ahead of the formal comment period for the MS4 Permit re-issuance. Seattle's six major comments, general comments, and suggested edits are detailed below. Seattle based these comments on the February 28, 2023, version of Ecology's SSC Preliminary Draft "Fact Sheet", Attachment A (proposed S5.C.7 language) and Attachment B (proposed Appendix 12 language).

#### Major Comment #1: Appreciation and Limitations

Seattle appreciates Ecology's consideration and incorporation of SSC Policy Advisory Committee (PAC) input into the preliminary draft permit. Seattle commends Ecology's well-planned reissuance process and supports the early input opportunities offered over the last year for future MS4 permit updates. Overall, Seattle believes the proposed updates to the SSC requirement will make the permit more effective in preventing and reducing impacts to waters of the state caused by discharges from the MS4. Seattle's comments on the preliminary draft are below. Seattle observes that, even with recommended updates, the SSC point framework is an imperfect tool for quantifying the benefits of a Permittee's SSC program. This is due to both the scientific limitations in understanding SSC effectiveness and the diversity of Permittee land use and receiving water bodies (as identified in the SSC Scientific Synthesis Report). The SSC point framework is a good tool to reflect progress toward addressing hydrologic and pollutant impacts from the MS4 that may not be adequately controlled by other permit requirements, but the framework should not drive the priorities of a Permittee's SSC Program.

#### Major Comment #2: High Pollutant Generating Areas

Seattle appreciates Ecology's intent to incorporate the PACs recommendation to incentivize (i.e., credit more points for) projects that drain "High Pollutant Generating Areas" (HPGAs), identified by the PAC as high use roadways and high density and commercial and industrial areas. However, the proposed preliminary permit language does not fully capture this objective.

The preliminary draft permit language links HPGA only to "runoff treatment in a known water quality problem area" (proposed Appendix 12 Table 3, row 4). The intent of the PAC recommendation was to incentivize projects in HPGAs (e.g., high Annual Average Daily Traffic [AADT] roadways), versus lower pollutant generating areas (e.g., a sidewalk), across all "Project Achievement Descriptions". Treating HPGAs should be incentivized for all projects that achieve "Runoff Treatment", "Runoff Treatment in a known water quality problem area", "enhanced for phosphorous treatment", and those that "meet WQ standards for target pollutants" (i.e., proposed Appendix 12 Table 3, rows 3, 4, 5, and 6 respectively). As an example, if HPGA-related multipliers were applied to more "Project Achievement Descriptions", then there could be an added incentive for Permittees to conduct projects that achieve enhanced treatment for metals located in a HPGA.

To incentivize treatment in HPGAs and encourage multiple achievement outcomes, Seattle recommends that Table 3 be updated to include a higher value "SSC Program Point Multiplier" for all projects that treat HPGAs, as shown in the suggested edits (in Tracked Changes) to Table 3 of the preliminary draft, below. This is the same format that was recommended by the SSC PAC Multipliers Workgroup.

#1 & #4	area.	<del>31.0</del> times Flow Control Equivalent area
#2 & #4	Runoff Treatment	24.0 times Runoff Treatment Equivalent area (or 2.5 times if treats HPGA <sup>5</sup> )
#2 & #4	Runoff Treatment in a known water quality problem area including High Pollution Generating Area (HPGA) <sup>5</sup>	34.5 times Runoff Treatment Equivalent area (or 3.5 times if treats HPGA <sup>5</sup> )
#2 & #4	Achieves Enhanced or Phosphorus Treatment	32.0 times Runoff Treatment Equivalent area (or 4.5? times if treats HPGA <sup>5</sup> )
#2 & #4	Meets WQ standards for target pollutant	2.5 times Runoff Treatment Equivalent area (or 5.5 times if treats HPGA <sup>5</sup> )
	Provides LD Performance (i.e. On-site	

### Major Comment #3: Supporting Work in Basins that Discharge to Flow Control Exempt Receiving Waters that Include Sediment Cleanup Sites

In the current Phase I MS4 permit, and in the preliminary draft SSC Program language, projects in flow control exempt waterbodies are only eligible for approximately half as many points as projects in non-flow control exempt basins. This is because projects that discharge to flow control exempt waterbodies (see Stormwater Management Manual for Western Washington Appendix 1) can only receive runoff treatment points and not flow control points. As an example, a one-acre bioretention facility in a creek basin (even if non-salmon bearing) is eligible to receive approximately twice as many points as a one-acre bioretention facility in a basin draining to the Lower Duwamish Waterway, a flow-control exempt water body with an established sediment cleanup plan (note: the Lower Duwamish Waterway is both a State MTCA and Federal CERCLA cleanup site). The current and proposed points system therefore unintentionally disincentivizes Permittees from constructing treatment facilities around some flow-control exempt water bodies like the Duwamish River, because it doesn't credit as many points. Seattle believes that controlling and treating stormwater in basins that discharge to a flow control exempt waterbody with sediment cleanup goals like the Duwamish River plays an important source control role and supports planned sediment cleanup efforts by helping prevent sediment recontamination.

Similar to the change recommended by the PAC in their SSC Final Report, Seattle recommends doubling the number of points received for projects in drainage basins that discharge to a flow control exempt waterbody that includes a sediment cleanup site (State and/or Federal) so that they are eligible to receive as many points as projects in non-flow control exempt basins (by doubling the number of points received for treatment).

In addition, Seattle recommends a slight edit to proposed footnote #3 after Table 3 in the preliminary draft SSC Program language to encourage SSC projects that drain to the Duwamish Waterway (which includes the Lower Duwamish Waterway, East Waterway and West Waterway). The language could be updated to include other sediment cleanup sites in flow control exempt waterbodies that receive discharges from MS4 basins, such as Thea Foss Waterway. Pasted below is Ecology's proposed footnote 3 language. Seattle proposes adding the following sentence to the end of Ecology's proposed text: "If a project utilizing a multiplier from this footnote drains to the Duwamish Waterway (including the Lower Duwamish Waterway, East Waterway, and West Waterway), double the multiplier."

2.3. Multiply SSC point total by ~~1.50-10~~ for completed capital projects related to the MS4 which implement an Ecology-approved basin plan (refer to Permit Appendix 1, Section 7), ~~or~~ Watershed-Scale Stormwater Plan from the 2013 *Phase I Municipal Stormwater Permit*; Special Condition S5.C.5.c, a Stormwater Management Action Plan, ~~or~~ a TMDL (refer to Appendix 2), ~~or~~ an Ecology-approved Adaptive Management Plan (refer to Permit's Special Condition S4F and Appendix 13), or an interlocal watershed agreement, or drains to the East Waterway or West Waterway. Cite the specific plan associated with the project in the 'Comments' field of Table 1. If a project utilizing a multiplier from this footnote drains to the Duwamish Waterway (including the Lower Duwamish Waterway, East Waterway, and West Waterway), double the multiplier.

**Major Comment # 4: Street Sweeping and Line Cleaning Incentivization in HPGA Areas**

Street sweeping and line cleaning are important source control actions that not only reduce the pollutant load to waterbodies but also to treatment systems, thereby extending their treatment (or media) life. Seattle supports Ecology's multiplier increases to the "Maintenance with capital construction costs..." "Project Achievement Description" proposed in Table 3 of the draft preliminary SSC Program language. Source control actions like street sweeping and line cleaning are even more beneficial in HPGAs. To incentivize this work further in HPGAs, Seattle recommends that Ecology allow an additional 50% increase to the proposed SSC Program Point Multipliers incentive (i.e., increase to 0.15x for Street Sweeping and 0.015x for Line Cleaning) in Appendix 12 Table 3, as indicated below, when work is conducted in HPGAs.

#6 & #11	Maintenance with capital construction costs ≥ \$25,000 or other maintenance actions per S5.C.7.a.ii.(e).	0.25-50 times the <u>acres</u> area served by the maintenance activity <sup>5</sup> , or 0.125 times (curb miles/ <u>acres</u> swept x (# events/year 1)), <u>or (or 0.15 times if treats HPGA<sup>5</sup>)</u>
#7	Restoration of Riparian Buffer	0.010-0.025 times the linear feet of lines cleaned <u>(or 0.015 if treats HPGA<sup>5</sup>)</u> 0.25 times acres restored

**Major Comment #5: SSC Point Eligibility as of January 1, 2023**

As stated in Appendix 12 of the current Phase I MS4 permit, the SSC level of effort was required to be tallied at the end of 2022. The next permit is expected to be issued on August 1, 2024. Seattle understands that it is Ecology's intent to allow points for SSC project milestones reached between January 1, 2023, and when the next permit becomes effective to be eligible for meeting SSC requirements. The proposed language in Appendix 12 states that "Projects that were completed prior December 31, 2022 may not be included." To improve clarity and ensure that Permittees properly count SSC points beginning on January 1, 2023, in accordance with Ecology's intent, Seattle recommends the following updates (in red below) to S5.C.7.c of the Phase I MS4 permit:

S5.C.7.c. With each Annual Report, each Permittee shall provide a list of planned, individual projects scheduled for implementation during this Permit term for the purpose of meeting S5.C.7.d. In addition, each Permittee may include a list of individual projects scheduled for implementation from January 1, 2023, to [the date before the next permit effective date] for the purpose of meeting S5.C.7.d. These lists This list shall include at a minimum the information and formatting specified in Appendix 12.

**Major Comment #6: Street Sweeping and Line Cleaning are “Enhanced Operations”.**

Seattle considers street sweeping and line cleaning important additional operational measures conducted to remove pollutants before discharging to receiving water bodies. With that said, street sweeping and line cleaning for pollutant removal purposes do, in fact, reduce the longevity of streets and pipes, respectively. As such, they are not considered maintenance activities. Seattle suggests referring to Street Sweeping and Line Cleaning project types as “Enhanced Pollutant Removal Operations” or “Enhanced Operations”, rather than “Maintenance” or “Enhanced Maintenance”. Updates to this terminology in the proposed language should occur in applicable parts of permit condition S5.C.7 and Appendix 12 (such as page 16 of the proposed SSC preliminary draft document).

**General Comments and Summary of Suggested Edits**

Like Ecology, Seattle understands the importance of the MS4 permits and also recognizes that permit language and implementation should, and will, improve over time. Seattle would like to offer the following comments and/or suggestions for your consideration to help with that continuous improvement process.

Document Location*	Comment/Suggestion
<b><i>Preliminary Draft “Fact Sheet”</i></b>	
Page 1, 3 <sup>rd</sup> paragraph	Recommend deleting “legacy” as it’s unclear what is meant by “legacy development” versus “development”.
Page 1, 3 <sup>rd</sup> paragraph	Recommend deleting “legacy” as unclear what is meant by “legacy stormwater pollution” versus “stormwater pollution”.
Page 1, 3 <sup>rd</sup> paragraph	Recommend change to “Runoff that travels from paved surfaces...” to “Runoff from paved surfaces with vehicle usage...” for clarity.
Page 1, 3 <sup>rd</sup> paragraph	Recommend replacing “We” with “Ecology” here and throughout the text where appropriate. Sometimes “we” usage in text seems to indicate Ecology and sometimes seems to indicate something broader.
Page 1, 3 <sup>rd</sup> paragraph	Recommend changing “treating” to “addressing”. There are other actions besides treatment (e.g., street sweeping, decreasing vehicle traffic, product replacement) to help address 6PPD-Q in stormwater.
Page 2, 1 <sup>st</sup> paragraph	Recommend consistently referring to as “street sweeping” vs. “sweeping” unless Ecology is intending to include sweeping of other areas (e.g., parking lots).
Page 2, 2 <sup>nd</sup> paragraph	Recommend replacing “We took a...” with “Ecology took a...” Recommend replacing “We began by...” with “Ecology in conjunction with the SSC Technical Advisory Committee (TAC)...”
Page 2, 3 <sup>rd</sup> paragraph	Recommend deleting “and used the SSC Science Synthesis as a basis to discuss quantifying SSC requirements and the level of effort by permittees implementing SSC programs” as the SSC Science Synthesis Report was not used as a basis to discuss requirements by the PAC. Seattle’s understanding is that it did inform SSC PAC discussions along with other documents such as Ad Hoc White Papers, and other sources. Recommended replacing text with text from Background Section of the SSC PAC final report: “The purpose of the SSC PAC was to discuss and provide recommendations to help inform the SSC requirements, specifically in terms of a system for quantifying SSC requirements and the level of effort in Ecology’s Municipal Stormwater Permit reissuance.”

Document Location*	Comment/Suggestion
Page 2, 3 <sup>rd</sup> paragraph	Recommend replacing “There was a strong message to keep the basic SSC point system and...” with “There was a strong message to keep the basic SSC point system with modifications and...”
Page 2, 4 <sup>th</sup> paragraph	Recommend replacing "the desire..." with "the desire of Ecology and PAC members (Phase I & 2 Permittees, NGOs)..."
Page 2, 5 <sup>th</sup> paragraph	Recommend replacing “... to build on the retrofit work that has been done...” with “... to build on the structural stormwater control program work that has been done...: for clarity.
Page 2, 5 <sup>th</sup> paragraph	Recommend changing “Permittees” to “Permittees and other stakeholders”.
Page 3, 3 <sup>rd</sup> paragraph	Recommend replacing “traditional SSC types” with “SSC project types associated with facilities” for clarity.
Page 3, 3 <sup>rd</sup> paragraph	Recommend replacing “... make progress on retrofits...” with “... make progress on structural stormwater controls” for clarity. As noted previously, there are other actions, besides treatment, that can help address 6PPD-Q. Street sweeping is thought to help address road runoff toxicity and may be able to be implemented sooner in many areas.
Page 3 & 4	Refer to: <b>Major Comment #1: Appreciation and Limitations</b>
Page 4, 3 <sup>rd</sup> paragraph	Recommend moving “we are proposing a minimum number of SSC Program Points for these Project Types: 150 points.” to the “Performances Measures” section after Table 1 because the 150 points is a requirement rather than an incentive.
Page 4, last three paragraphs	Refer to: <b>Major Comment #2: High Pollutant Generating Areas</b> <b>Major Comment #3: Supporting Work in Basins that Discharge to Flow Control Exempt Receiving Waters that Include Sediment Cleanup Sites</b> <b>Major Comment # 4: Street Sweeping and Line Cleaning Incentivization in HPGA Areas</b>
Page 5, 2 <sup>nd</sup> paragraph	Recommend Ecology provide the technical information/justification that informed the change in sweeping multiplier, if available.
Page 5-6	Watershed Collaboration (proposed Project Type 12) is a method of implementing a project. Seattle supports watershed collaboration when there are water quality benefits because watersheds and water quality impacts are not bound by municipal boundaries. However, instead of calling this a Project Type, it may be better to provide additional credit for watershed collaboration in the form of extra incentive points within the current (11) Project Types list.
<b><i>Preliminary Draft S5.C.7.F Permit Language (Attachment A)</i></b>	
S5.C.7.a.ii (f), page 7	Delete “(f) Watershed Collaboration”. Refer to comment above addressing Fact Sheet page 5-6.
S5.C.7.c, page 8	Refer to <b>Major Comment #5: SSC Point Eligibility as of January 1, 2023.</b> Recommended changes in red text below: “c. With each Annual Report, each Permittee shall provide a list of planned, individual projects scheduled for implementation during this Permit term for the purpose of meeting S5.C.7.d. <u>In addition, each Permittee may include a list of individual projects scheduled for implementation from January 1, 2023, to [the date before the next permit effective date] for the purpose of meeting S5.C.7.d. These lists</u> <del>This list</del> shall include at a minimum the information and formatting specified in Appendix 12.”

Document Location*	Comment/Suggestion
S5.C.7.d.iii, page 8	For clarity, recommend changes in red text below: "iii. A minimum 150 SSC Program Points, <u>of the 500 points required in S5.C.7.d.i and ii</u> , for Project Types listed above at S5.C.7.a.i.(a)–(d)."
<b>Preliminary Draft Appendix 12 (Attachment B)</b>	
Table 2., page 9	"Reporting Year" column heading: Ecology may consider clarifying how the column should be used (e.g., should Permittees add a new row each year for each project?).
"Other Point Factor", first paragraph, page 12	<p>Recommend adding the following text. Refer to <b>Major Comment #3: Supporting Work in Basins that Discharge to Flow Control Exempt Receiving Waters that Include Sediment Cleanup Sites.</b></p> <p>"If your project implements an Ecology-approved basin plan (refer to Appendix 1, Section 7) or Watershed-Scale Stormwater Plan from the previous <i>Phase I Municipal Stormwater Permit cycles</i>, Special Condition S5.C.5.c, Stormwater Management Action Plan, a TMDL (refer to Appendix 2), or an Ecology-approved adaptive Management Plan (refer to S4F and Appendix 13), <u>or drains to the Duwamish Waterway (including the Lower Duwamish Waterway, East Waterway, and West Waterway)</u>, note the appropriate point factor here. A point factor can be applied if the project is implementing a local interlocal agreement for a watershed collaboration. See "How to Calculate Area and Points for Watershed Collaboration."</p> <p>If other sediment cleanup sites are included in the proposed footnote #3 after Table 3, then those should be added to the "Other Point Factor" text as well.</p>
"Receiving Water Body Name", page 13	<p>Recommend deleting "to groundwater". Seattle assumes that Ecology's intent is to identify whether stormwater from the project is infiltrating or not. Based on our understanding, water can infiltrate but not necessarily reach groundwater.</p> <p>"List the waterbody to which the stormwater from the project discharges. If a receiving water body is unnamed, also include the name of the water body that the unnamed creek/lake is a tributary. Also indicate if the stormwater from the project is infiltrated wholly or partially <u>to groundwater.</u>"</p>
"List of Qualifying Project Types", page 14	Recommend deleting "12. Watershed Collaboration" because it is better defined as a way of implementing the project, rather than a Project Type.
"(11) Street Sweeping / Line Cleaning", page 16	<p>Recommend changing how street sweeping and line cleaning are categorized. Refer to <b>Major Comment #6: Street Sweeping and Line Cleaning are "Enhanced Operations"</b>.</p> <p>"Ecology intends this category to encompass the following <u>enhanced operations</u> <del>"enhanced maintenance"</del> projects, not otherwise used to comply with S5.C.10."</p> <p>Seattle also sees the value in explicitly calling out the difference between SSC points for a qualifying street sweeping program (Appendix 12) and street sweeping required in permit condition S5.C.10. To do this, Seattle recommends updating this sentence in Appendix 12 to include the red text: "The SSC Program Points for a qualifying street sweeping program is based on... and frequency of sweeping <u>that is in addition to street sweeping performed to meet permit requirement S5.C.10.</u>"</p>
"(12) Watershed Collaboration", page 17	Recommend deleting this section. Refer to comment above addressing Fact Sheet page 5-6.

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Table 3, page 18.	<p>Recommend the following changes as described in <b>Major Comment #2: High Pollutant Generating Areas</b> and <b>Major Comment # 4: Street Sweeping and Line Cleaning Incentivization in HPGA Areas</b>. Recommended changes are below.</p> <table border="1" data-bbox="391 352 1344 877"> <tbody> <tr> <td data-bbox="391 352 526 386">#1 &amp; #4</td> <td data-bbox="526 352 954 386">area.</td> <td data-bbox="954 352 1344 386"><del>31.0</del> times Flow Control Equivalent area</td> </tr> <tr> <td data-bbox="391 386 526 443">#2 &amp; #4</td> <td data-bbox="526 386 954 443">Runoff Treatment</td> <td data-bbox="954 386 1344 443"><del>21.0</del> times Runoff Treatment Equivalent area <del>(or 2.5 times if treats HPGA<sup>5</sup>)</del></td> </tr> <tr> <td data-bbox="391 443 526 520">#2 &amp; #4</td> <td data-bbox="526 443 954 520">Runoff Treatment in a known water quality problem area <del>including High Pollution Generating Area (HPGA)<sup>5</sup></del></td> <td data-bbox="954 443 1344 520"><del>31.5</del> times Runoff Treatment Equivalent area <del>(or 3.5 times if treats HPGA<sup>5</sup>)</del></td> </tr> <tr> <td data-bbox="391 520 526 577">#2 &amp; #4</td> <td data-bbox="526 520 954 577">Achieves Enhanced or Phosphorus Treatment</td> <td data-bbox="954 520 1344 577"><del>32.0</del> times Runoff Treatment Equivalent area <del>(or 4.5? times if treats HPGA<sup>5</sup>)</del></td> </tr> <tr> <td data-bbox="391 577 526 655">#2 &amp; #4</td> <td data-bbox="526 577 954 655">Meets WQ standards for target pollutant</td> <td data-bbox="954 577 1344 655"><del>2.5</del> times Runoff Treatment Equivalent area <del>(or 5.5 times if treats HPGA<sup>5</sup>)</del></td> </tr> <tr> <td data-bbox="391 655 526 688"></td> <td data-bbox="526 655 954 688">Provides LR Performance (i.e., On-site)</td> <td data-bbox="954 655 1344 688"></td> </tr> <tr> <td data-bbox="391 688 526 848">#6 &amp; #11</td> <td data-bbox="526 688 954 848">Maintenance with capital construction costs ≥ \$25,000 or other maintenance actions per S5.C.7.a.ii.(e).</td> <td data-bbox="954 688 1344 848"><del>0.25-50</del> times the <del>acres</del>area served by the maintenance activity<del>, or</del> <del>0.125</del> times (curb miles/acres swept x (# events/year - 1)), <del>or (or 0.15 times if treats HPGA<sup>5</sup>)</del> <del>0.010.025</del> times the linear feet of lines</td> </tr> <tr> <td data-bbox="391 848 526 877">#7</td> <td data-bbox="526 848 954 877">Restoration of Riparian Buffer</td> <td data-bbox="954 848 1344 877">cleaned. <del>(or 0.15 if treats HPGA<sup>5</sup>)</del> <del>0.25</del> times acres restored</td> </tr> </tbody> </table>	#1 & #4	area.	<del>31.0</del> times Flow Control Equivalent area	#2 & #4	Runoff Treatment	<del>21.0</del> times Runoff Treatment Equivalent area <del>(or 2.5 times if treats HPGA<sup>5</sup>)</del>	#2 & #4	Runoff Treatment in a known water quality problem area <del>including High Pollution Generating Area (HPGA)<sup>5</sup></del>	<del>31.5</del> times Runoff Treatment Equivalent area <del>(or 3.5 times if treats HPGA<sup>5</sup>)</del>	#2 & #4	Achieves Enhanced or Phosphorus Treatment	<del>32.0</del> times Runoff Treatment Equivalent area <del>(or 4.5? times if treats HPGA<sup>5</sup>)</del>	#2 & #4	Meets WQ standards for target pollutant	<del>2.5</del> times Runoff Treatment Equivalent area <del>(or 5.5 times if treats HPGA<sup>5</sup>)</del>		Provides LR Performance (i.e., On-site)		#6 & #11	Maintenance with capital construction costs ≥ \$25,000 or other maintenance actions per S5.C.7.a.ii.(e).	<del>0.25-50</del> times the <del>acres</del> area served by the maintenance activity <del>, or</del> <del>0.125</del> times (curb miles/acres swept x (# events/year - 1)), <del>or (or 0.15 times if treats HPGA<sup>5</sup>)</del> <del>0.010.025</del> times the linear feet of lines	#7	Restoration of Riparian Buffer	cleaned. <del>(or 0.15 if treats HPGA<sup>5</sup>)</del> <del>0.25</del> times acres restored
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Table 3, page 18	Seattle noticed that the preliminary draft indicates a “3.0 times” multiplier for “Achieves Enhanced or Phosphorus Treatment”, which is 1.5x the multiplier in the current permit (current multiplier is “2.0 times”); however, Ecology has proposed a 2x increase to the multiplier for other “Project Achievements Descriptions”. If this was intentional, Ecology might consider providing a rationale for not doubling the “Achieves Enhanced or Phosphorus Treatment” category like the other categories in the preliminary draft. If the intent was to double all of those multipliers in Table 3, then “Achieves Enhanced or Phosphorus Treatment” should have a multiplier of “4.0 times”.																								
Table 3, Note 1., page 19	Seattle assumes Footnote 1 is Footnote 5 referenced in Table 3 (i.e., HPGA <sup>5</sup> ) and recommends the following changes. (Refer to <b>Major Comment #2: High Pollutant Generating Areas</b> and <b>Major Comment #3: Supporting Work in Basins that Discharge to Flow Control Exempt Receiving Waters that Include Sediment Cleanup Sites.</b> ) <del>“Known water quality problem areas can include</del> High Pollution Generating Areas are <del>areas that drain to a Superfund designated receiving water,</del> areas with arterials (or AADT>25,000), or areas >50% commercial/industrial or high density developed land use. Reference <del>water quality problem area or</del> HPGA in Comments. “																								
Table 3, Note 3., page 19	Recommend adding the following sentence to the end of the proposed text (footnote 3): <del>“If a project utilizing a multiplier from this footnote drains to the Duwamish Waterway (including the Lower Duwamish Waterway, East Waterway, and West Waterway), double the multiplier.”</del> Refer to <b>Major Comment #3: Supporting Work in Basins that Discharge to Flow Control Exempt Receiving Waters that Include Sediment Cleanup Sites.</b>																								

Document Location*	Comment/Suggestion
"How to Calculate Area and SSC Points for Small Projects under 1 Acre.", page 22	Recommend the following minor edit because benefits could be related to flow control in addition to water quality. "A single project may be eligible to earn SSC points for LID, Runoff Treatment, and Flow Control, based on the <del>water quality</del> benefits provided by the project."
"How to Calculate Area and SSC Points for Watershed Collaboration", page 22	Consider updating text to reflect watershed collaboration comment above (addressing Fact Sheet page 5-6).

\* "Document location" refers to the location of the text in the February 28, 2023, version of Ecology's Phase I MS4 Permit SSC Preliminary Draft "Fact Sheet" (including Attachments A and B).