

**Western Washington Phase II Municipal Stormwater Permit**  
**Stormwater management for priority developed areas-preliminary draft comments**

| Comment # | Everett Comment  |
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| 1         | <p>WWA Phase II Proposed level of effort 1.b. assignment of acres of land "managed" by the Permittee is proposed to be scaled based on 2020 population needs to be defined more clearly. The Ecology workshop defined this area as land under the MS4 and managed by the Permittee as part of the Permit. The City of Everett, has population that resides in the combined sewer area of the City, which includes 19.7% of the City's total population which is 22,100. This area is under the combined sewer system and associated Permit. The City of Everett Stormwater separated area includes 80.3% of the City's total population which is 89,848. The population used to assign equivalent acres for the City of Everett should be excluded from the combined sewer service area. This method would be consistent with how the permit fee is calculated based on Housing Units within the separated stormwater areas.</p> |
| 2         | <p>Define land managed. Is it land managed by the jurisdiction or only land served by the MS4? Further clarify that this excludes areas of communities served by combined sewer systems.</p>   |
| 3         | <p>Clarify if large projects that are built during one permit cycle that provide substantial flow and water quality control above and beyond the Permit required acres to be treated per the Permit requirement can be banked or used toward future permits. City's may be constructing significant regional projects in one permit cycle (treating 50 to 100 acres), but not planning to construct again in the next permit cycle.</p>  |
| 4         | <p>If basic treatment is required for a project the City is constructing, but enhanced treatment is utilized instead, can this additional treatment be used to fulfill equivalent acres?</p>   |
| 5         | <p>For considerations in Overburdened Communities should this be an incentive to multi-purpose projects (includes open space/parks in addition to stormwater benefit)?</p>   |
| 6         | <p>Language for Overburdened Communities should be carefully worded so that it doesn't incentivize impacting those communities.</p>  |