

City of Olympia

Thank you for the opportunity to provide informal comments to the preliminary draft permit language.

We appreciate the work that was completed by Ecology and the PAC to help improve on the SSC program.

We also appreciate the opportunity provided to phase II's to incorporate SMAP where and when appropriate as well as the use of SSC to be implemented as opportunities arise.

We ask that further consideration and time be given in order to develop a more robust public engagement and outreach process that includes overburdened communities. It could prove beneficial in allowing more time to prepare and work with our communities prior to pushing out and constructing projects solely focused on meeting the permit requirement of an acreage standard.

One final suggestion. Is it possible to consider including a multiplier or weighted factor in determining the acreage required for retrofits. While the current method of using population-to-acreage ratio seems fair, there are cases where it may not account for variations in industrial operations and building densities. For instance, some permittees with smaller populations may have more extensive industrial activities, leading to greater hard surfaces and pollutant loads. Conversely, some permittees with larger populations may have more compact urban areas with high-rise buildings. It may not be equitable to penalize the latter for implementing 'smart growth' standards. Would it be possible to explore ways to address these issues?

These comments are meant to help guide Ecology in further decisions when drafting the next round of formal permit language.