

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
S6-9					<p><u>Regulatory/Permit Reference</u> Phase I Permit Condition Section S6.A – Secondary Permittees and New Secondary Permittees Coverage Proposed new bullet S6.A.7</p> <p><u>Comment</u> Add new bullet point S6.A.7 per suggested revision below. Similar to the time allowed to other Phase I permittees to update their stormwater programs, manuals, and codes, Secondary Permittees need time to conduct a thorough review of their stormwater program to ensure compliance with local rules and regulations such as the City of Seattle stormwater code and stormwater manuals which are updated to be consistent with the Phase I Permit and Stormwater Management Manual for Western Washington.</p> <p><u>Suggested Revision</u> Add new bullet point S6.A.7. <u>"No later than 12 months from the effective date of the SWMMWW, SWMMEW, or local jurisdiction's stormwater code and equivalent stormwater manual, whichever is later, each Secondary Permittee shall adopt and make effective local policies, procedures and manuals to be as protective, or more protective, than those specified in the SWMMWW, SWMMEW, or relevant stormwater ordinances, rules, and regulations of the local jurisdiction(s) in which the Secondary Permittee is located."</u></p>	Port of Seattle
S6-9					<p><u>Regulatory/Permit Reference</u> Phase I Permit Condition S6.E.1.c – Education Program</p> <p><i>As identified during visual inspection and regular maintenance of storm drain inlets per the requirements of S6.D.3.d and S6.D.6.a.i, below, or as otherwise reported...</i></p> <p><u>Comment</u> This change references Condition S6.D.3.d and S6.D.6.a.i which are not applicable to the Port of Seattle and Port of Tacoma. The references should be corrected to S6.E.3.d and S6.E.6.b.i.</p> <p><u>Suggested Revision</u> Update text for S6.E.1.c to read "As identified during visual inspection and regular maintenance of storm drain inlets per the requirements of <u>S6.E.3.d and S6.E.6.b.i</u>, below, or as otherwise reported..."</p>	Port of Seattle

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S6-9					<p>Regulatory/Permit Reference Phase I Permit Conditions S6.E.6.a.iv – Operation and Maintenance Program <i>6. Operation and Maintenance Program</i></p> <p><i>a. Each Permittee shall Implement an Operations and Maintenance (O&M) manual for all stormwater treatment and flow control BMPs/facilities and catch basins under the functional control of the Permittee and which discharge stormwater to its MS4, or to an interconnected MS4.</i></p> <p><i>iv. Building exterior cleaning and maintenance.</i> <i>a. The O&M Plan shall address, building exterior cleaning and maintenance including cleaning, washing, painting; maintenance and management of dumpsters; other maintenance activities. For buildings owned by the Secondary Permittee and built or renovated between 1950 and 1980, the O&M Plan shall include building material assessment for PCBs consistent with How to Find and Address PCBs in Building Materials guidance (Ecology, 2022; Publication No. 22- 040-024) prior to exterior building washdown. Structures confirmed or suspected to have PCB-containing materials shall not discharge washdown to the MS4.</i></p> <p><i>v. Preparing Permittee-owned buildings for renovation or demolition.</i> <i>a. The O&M Plan shall address Source Control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.</i></p> <p>Comment This condition references an “O&M Plan” but should reference the “O&M Manual” to be consistent with other conditions under S6.E for the Port of Seattle and Port of Tacoma.</p> <p>Suggested Revision S6.E.6.a.iv.a. The O&M Plan <u>O&M Manual</u> shall address, building exterior cleaning and maintenance including cleaning, washing, painting; maintenance and management of dumpsters; other maintenance activities. For buildings owned by the Secondary Permittee and built or renovated between 1950 and 1980, the O&M Plan <u>O&M Manual</u> shall include building material assessment for PCBs consistent with How to Find and Address PCBs in Building Materials guidance (Ecology, 2022; Publication No. 22- 040-024) prior to exterior building washdown. Structures confirmed or suspected to have PCB-containing materials shall not discharge washdown to the MS4.</p> <p>S6.E.6.a.v.a. The O&M Plan <u>O&M Manual</u> shall address Source Control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.</p>	Port of Seattle

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S6-9					<p>Regulatory/Permit Reference Phase I Permit Condition S6.E.6.c.i – Operation and Maintenance Program <i>Sweep areas owned or operated by Permittee on lands owned or operated by the Ports at least quarterly and at least once between July and September each year, as determined by the Permittee to provide additional water quality benefits. For calendar year 2027, only one sweeping event is required.</i></p> <p>Comment Many Port lands are leased to tenants who have functional control of these areas and are covered by separate NPDES permits such as the Industrial Stormwater General Permit, Boatyard Permit, or an Individual Industrial Stormwater Permit. Note that tenants are required to sweep their leaseholds/facilities under these separate NPDES permits, typically on at least a quarterly basis. Unless contracted by a tenant, the Port is not able to sweep areas that are leased by tenants and under their functional control. Other Phase I Permit conditions such as S6.E.4 and S6.E.6 reference the “functional control of the Permittee” and the proposed Phase I Permit language under S6.E.6.c.i should do the same.</p> <p>There is no need to reference the requirement to sweep at least once between July and September as that is the third quarter of the year, and is covered by the requirement to sweep at least quarterly.</p> <p>Suggested Revision Sweep areas owned or operated by Permittee on lands owned or operated by the Ports <u>that are under the functional control of the Permittee</u> at least quarterly and at least once between July and September each year, as determined by the Permittee to provide additional water quality benefits. <u>Areas covered under a separate NPDES Permit are not subject to this requirement.</u> For calendar year 2027, only one sweeping event is required.</p>	Port of Seattle

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Appendices					<p>Regulatory/Permit Reference Phase I Permit Appendix 1, Section 1 Exemptions</p> <p><u>Pavement Maintenance Projects</u> <i>The exemptions described below may only be applied to an entire project. The entire project must be for the sole purpose of maintaining a pavement area. Pavement maintenance projects do not involve redevelopment work beyond the pavement maintenance. Pavement maintenance projects do not change the characteristics of a roadway (e.g. changing a four-way intersection to a roundabout is not a pavement maintenance project). Projects that are not solely for pavement maintenance work are not exempt from the Minimum Requirements, and must consider any pavement maintenance areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p><u>Comment #1 on Pavement Maintenance Projects</u> The purpose of pavement maintenance is to restore the original function of the pavement and does not alter stormwater runoff characteristics or change the land use. Often, the repair of damaged areas of pavement is incorporated into larger projects due to efficiencies and cost savings for mobilization, materials/supplies, etc.</p> <p>The stormwater impact for pavement maintenance is no different whether the pavement maintenance is completed as a standalone project or incorporated into a larger project. As such, the exemption should apply to any pavement maintenance practice and not just an entire project that is completed exclusively for pavement maintenance. The review process for development/redevelopment projects completed by the applicable jurisdictional authority includes the review and approval of the pavement maintenance exemption and that review would address potential to use the pavement maintenance exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p><u>Suggested Revision</u> <i>The existing language is included for Pavement Maintenance Practices in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1.</i></p> <p>Retain the existing language for the Pavement Maintenance Practices Exemption that allows for the Pavement Maintenance Practices Exemption to be applied to portions of a project, with clarification that new and/or expanded impervious area does not qualify for the exemption. If the language will be modified, it should be clarified as follows with suggested language below:</p> <ol style="list-style-type: none"> 1) The Pavement Maintenance Practices Exemption can be applied to redevelopment projects for the specified list of Pavement Maintenance Activities. <p><u>Pavement Maintenance Practices Projects</u> The exemptions described below may only be applied to a portion of a redevelopment project or maintenance/rehabilitation project an entire project. The entire project must be for the sole purpose of maintaining a pavement area. Pavement maintenance projects do not involve redevelopment work beyond the pavement maintenance. Pavement maintenance projects do not change the characteristics of a roadway (e.g. changing a four-way intersection to a roundabout is not a pavement maintenance project). Projects that are not solely for pavement maintenance work are not exempt from the Minimum Requirements, and must consider any pavement maintenance areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</p> <p>The following pavement maintenance <u>practices projects</u> are exempt from all Minimum Requirements:</p>	Port of Seattle

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					<p>Regulatory/Permit Reference Phase I Permit Appendix 1, Section 1 Exemptions</p> <p>Pavement Maintenance Projects <i>The exemptions described below may only be applied to an entire project. The entire project must be for the sole purpose of maintaining a pavement area. Pavement maintenance projects do not involve redevelopment work beyond the pavement maintenance. Pavement maintenance projects do not change the characteristics of a roadway (e.g. changing a four-way intersection to a roundabout is not a pavement maintenance project). Projects that are not solely for pavement maintenance work are not exempt from the Minimum Requirements, and must consider any pavement maintenance areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p>Comment #2 on Pavement Maintenance Projects The purpose of pavement maintenance is to restore the original function of the pavement and does not alter stormwater runoff characteristics or change the land use. Often, the repair of damaged areas of pavement is incorporated into larger projects due to efficiencies and cost savings for mobilization, materials/supplies, etc.</p> <p>The stormwater impact for pavement maintenance is no different whether the pavement maintenance is completed as a standalone project or incorporated into a larger project. Pavement maintenance can be conducted with other maintenance/rehabilitation activities, such as utility and railroad work. The proposed language would impact combining multiple types of maintenance/rehabilitation activities that allow for exemptions but wouldn't be able to be conducted as one project. This would lead to inefficiencies and increased costs for the maintenance and repair of existing infrastructure. As such, the exemption should allow for different types of maintenance/rehabilitation activities to be combined into a single project with the whole project provided the exemption from certain minimum requirements (e.g., a project that only includes both utility work and pavement maintenance).</p> <p>The review process for development/redevelopment projects completed by the applicable jurisdictional authority includes the review and approval of the pavement maintenance exemption and that review would address potential to use the pavement maintenance exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p>Suggested Revision <i>The existing language is included for Pavement Maintenance Practices in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1. Update the proposed language in Appendix and Volume 1 to allow multiple exemptions to be applied to a single project.</i></p> <p>Pavement Maintenance Projects The exemptions described below may only be applied to an entire project <u>that consists of pavement maintenance, utility work, railroad maintenance, and other exempt activities</u>. The entire project must be for the sole purpose of maintaining a pavement area, <u>installing, maintaining, and/or upgrading a utility (involving only the trenching necessary for the utility work, including any over-excavating necessary for the utility trench), and maintaining railroad tracks and associated ballast/pavement</u>. Pavement maintenance projects do not involve redevelopment work beyond the pavement maintenance <u>or other work described above</u>. Pavement maintenance projects do not change the characteristics of a roadway (e.g. changing a four-way intersection to a roundabout is not a pavement maintenance project). Projects that are not solely for pavement maintenance work <u>or other work described above</u> are not exempt from the Minimum Requirements, and must consider any pavement maintenance areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</p>	Port of Seattle

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Appendices					<p>Regulatory/Permit Reference Phase I Permit Appendix 1, Section 1 Exemptions</p> <p><u>Underground Utility Projects</u> <i>This exemption may only be applied to an entire project. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench). Underground utility projects do not involve redevelopment work beyond the utility work. Projects that are not solely for underground utility work are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p><u>Comment #1 on Underground Utility Projects</u> The purpose of utility projects is to provide utilities or to restore the functionality of utilities and does not alter stormwater runoff characteristics or change the use of the land. Often, the installation, modification, upgrade, or removal of utilities are incorporated into larger projects due to cost savings for mobilization, materials/supplies, etc.</p> <p>The stormwater impact for utility projects is no different whether the utilities are completed as a standalone project or incorporated into a larger project. As such, the exemption should apply to any activity involving the installation, modification, upgrade, or removal of utilities and not just an entire project that is completed exclusively for utilities. The current review process for development/redevelopment projects includes the review and approval of the utility facility exemption and that review would address potential to use the utility facility exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p><u>Suggested Revision</u> <i>The existing language is included for Utility Projects in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1.</i></p> <p>Retain the existing language for the exemption for Utility Projects, including projects to install new utilities, which allows for the Utility Projects Exemption to be applied to portions of a project.</p> <p>If the language will be modified, it should be clarified as follows with suggested language below:</p> <ol style="list-style-type: none"> 1) The Utilities Projects Exemption, including the installation of new facilities, can be applied to redevelopment projects if the exemption criteria are met. <p><u>Underground Utility Projects</u> This exemption may only be applied to a portion of a redevelopment project or maintenance/rehabilitation project an entire project. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench). Underground Utility projects do not involve redevelopment work beyond the utility work. Projects that are not solely for underground utility work are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</p>	Port of Seattle

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Appendices					<p>Regulatory/Permit Reference Phase I Permit Appendix 1, Section 1 Exemptions</p> <p><u>Underground Utility Projects</u> <i>This exemption may only be applied to an entire project. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench). Underground utility projects do not involve redevelopment work beyond the utility work. Projects that are not solely for underground utility work are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p><u>Comment #2 on Underground Utility Projects</u> The purpose of utility projects is to provide utilities or to restore the functionality of utilities and does not alter stormwater runoff characteristics or change the use of the land. Often, the installation, modification, upgrade, or removal of utilities are incorporated into larger projects due to cost savings for mobilization, materials/supplies, etc.</p> <p>Utility work can be conducted with other maintenance/rehabilitation activities, such as pavement and railroad work. The proposed language would impact combining multiple types of maintenance/rehabilitation activities that allow for exemptions but wouldn't be able to be conducted as one project. This would lead to inefficiencies and increased costs for the maintenance and repair of existing infrastructure.</p> <p>The stormwater impact for utility projects is no different whether the utilities are completed as a standalone project or incorporated into a larger project. As such, the exemption should apply to any activity involving the installation, modification, upgrade, or removal of utilities and not just an entire project that is completed exclusively for utilities. The current review process for development/redevelopment projects includes the review and approval of the utility facility exemption and that review would address potential to use the utility facility exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p><u>Suggested Revision</u> <i>The existing language is included for Utility Projects in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1.</i></p> <p>Update the proposed language in Appendix and Volume 1 to allow multiple exemptions to be applied to a single project.</p> <p><u>Underground Utility Projects</u> This exemption may only be applied to an entire project <u>that consists of pavement maintenance, utility work, railroad maintenance, and other exempt activities</u>. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench), <u>maintaining a pavement area, maintaining railroad tracks and associated ballast/pavement, or any other exempt activity</u>. Underground Utility projects do not involve redevelopment work beyond the utility work <u>or other work described above</u>. Projects that are not solely for underground utility work <u>or other work described above</u> are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</p>	Port of Seattle

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Appendices					<p><u>Regulatory/Permit Reference</u> Phase I Permit Appendix 1, Section 1 Exemptions</p> <p><u>Underground Utility Projects</u> <i>This exemption may only be applied to an entire project. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench). Underground utility projects do not involve redevelopment work beyond the utility work. Projects that are not solely for underground utility work are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p><u>Comment #3 on Underground Utility Projects</u> The Port requests that Ecology expands/clarifies the interpretation of “underground” utility projects. Utilities can be both above and below ground. Even underground utilities have an aboveground component at some point. The Port believes the exemption should clarify whether the intent is to not exempt utilities with a large aboveground component (i.e., large substations), rather than not cover overhead utilities lines (poles), electric vehicle stations, or shore power facilities. This is very relevant due to the need for electrification and upgrading utility infrastructure, shore power, and Electrical Vehicle charging stations.</p> <p><u>Suggested Revision</u> Add clarification on necessary or allowed aboveground work that can be considered as part of this exemption. This could be clarified by creating a list of allowed aboveground uses or setting a size threshold (i.e., WAC 197-11-800 has a SEPA utility exemption limit to not include substations or facilities with other voltage parameters).</p> <p>Aboveground utility work should be provided the same exemption as underground utility work. This could be accomplished by removing references to “underground” in the existing exemption or creating a new exemption for aboveground utilities.</p>	Port of Seattle

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Appendices					<p>Regulatory/Permit Reference Phase I Permit Appendix 1, Section 1 Exemptions</p> <p>Comment An exemption for “Railroad Maintenance Practices” should be added to the Phase I Municipal Stormwater Permit, Appendix 1, Section 1 Exemptions to create consistency with grading codes for local jurisdictions (e.g., City of Seattle). Railroads, similar to pavement and roadways, require ongoing maintenance to continue the original, intended function of the railroad. As such, railroad maintenance should be provided with the same/similar type of exemption as pavement maintenance and utility repairs/upgrades.</p> <p>Suggested Revision Add an exemption for “Railroad Maintenance Practices” to the Phase I Municipal Stormwater Permit, Appendix 1, Section 1 Exemptions as described below.</p> <p>Railroad Maintenance Practices <u>This exemption may only be applied to an entire project that consists of railroad maintenance, pavement maintenance, utility work, and other exempt activities. The entire project must be for the sole purpose of maintaining railroad tracks and associated ballast/pavement, maintaining a pavement area, installing, maintaining, and/or upgrading a utility, involving only the trenching necessary for the utility work (including any over-excavating necessary for the utility trench), or any other exempt activity. Railroad maintenance practices do not involve redevelopment work beyond the railroad maintenance work or other work described above. Projects that are not solely for railroad maintenance work or other work described above are not exempt from the Minimum Requirements, and must consider any railroad maintenance areas within the project as new or replaced hard surfaces or land disturbing activity when determining the applicable Minimum Requirements.</u></p> <p><u>The following railroad maintenance practices are exempt from all Minimum Requirements:</u></p> <ul style="list-style-type: none"> • <u>Replacing railroad ties</u> • <u>Replacing or repairing rail</u> • <u>Replacing ballast without expanding the area of coverage</u> • <u>Replacing or repairing existing asphalt, concrete, or brick pavement with asphalt or concrete without expanding the area of coverage</u> • <u>Reshaping or regrading of drainage systems or ditches</u> • <u>Vegetation maintenance</u> 	Port of Seattle

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Appendices					<p><u>Regulatory/Permit Reference</u> Phase I Municipal Stormwater Permit, Outfall Mapping Requirements</p> <p><u>Comment</u> To support tracking elevation and horizontal accuracy, consider including a greater number of options for the collection method instead of the coordinate accuracy ranges. It's typical for users to assume an accuracy of collection based on very little information outside of the collection method itself. Relying on users to always estimate the accuracy of a collection type correctly means that data isn't standardized. For example, all data collected with a sub-meter GPS unit should have +/- 3'. If "Sub-meter GPS" is an option for collection method, then it should not be possible for a user to enter +/- 40' or +/- 0.1' for that collection method. Moving to this model would mean that accuracy is more reliable across the jurisdictions included.</p> <p><u>Suggested Revision</u> Consider not requiring elevation and horizontal accuracy.</p>	Port of Seattle
Appendices					<p><u>Regulatory/Permit Reference</u> Phase I Municipal Stormwater Permit, Outfall Mapping Requirements</p> <p><u>Comment</u> To support tracking of material type, consider allowing a greater number of options or not requiring a valid value list. Typically, jurisdictions track many more material types than the three provided, plus "Other." Requiring jurisdictions to remap the material types they track into the categories provided would be an additional step that only serves to diminish the wealth of data being collected.</p> <p><u>Suggested Revision</u> Consider allowing a freeform entry for material type.</p>	Port of Seattle

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			Volume 3		<p>Regulatory/Permit Reference SWMMWW Volume 3, Chapter 1.2 Choosing Your Runoff Treatment BMPs, Step 5</p> <p>When is Enhanced Metals Treatment Required? Enhanced Metals Treatment BMPs are required for the types of project sites listed below that:</p> <ol style="list-style-type: none"> discharge directly to fresh waters designated for aquatic life use or that have an existing aquatic life use; or discharge to conveyance systems that are tributary to fresh waters designated for aquatic life use or that have an existing aquatic life use; or infiltrate stormwater within ¼ mile of a fresh water designated for aquatic life use or that has an existing aquatic life use. <p>The types of project sites are:</p> <ul style="list-style-type: none"> Sites subject to industrial activities, Commercial project sites, <u>Light rail elevated and non-elevated guideways/tracks</u> <u>Other project sites that are anticipated to generate a high pollutant loading, including:</u> <ul style="list-style-type: none"> <u>Parking areas as follows:</u> <ul style="list-style-type: none"> <u>Commercial or industrial areas: All on-street parking areas.</u> <u>Areas other than commercial or industrial areas:</u> <ul style="list-style-type: none"> <u>On-street parking areas on streets with an expected total AADT of ≥ 7,500.</u> <u>Parking areas with an expected trip end count ≥ 40 vehicles per 1,000 sf of gross building area.</u> <u>Parking areas with ≥ 100 expected trip ends per day.</u> <u>Fueling stations</u> <u>Log storage and sorting yards</u> <u>Railroad yards</u> <u>Transit center bus stops</u> <p>The following areas of the above-listed project sites do not require Enhanced Metals Treatment BMPs:</p> <ul style="list-style-type: none"> Areas that discharge directly, or indirectly through a municipal separate storm sewer system, to a water listed in Appendix III-A: Basic Treatment Receiving Waters in the SWMMWW. Landscaped areas of industrial, commercial, and multi-family project sites that do not involve any other pollution-generating sources (e.g., industrial activities, customer parking, storage of erodible or leachable material, wastes, or chemicals). Parking lots of industrial and commercial project sites, dedicated solely to parking of employees' private vehicles that do not involve any other pollution-generating sources (e.g., industrial activities, customer parking, storage of erodible or leachable material, wastes, or chemicals). <p>Comment Appendix III-A: Basic Treatment Receiving Waters does not specifically include the Duwamish River, Lake Washington Ship Canal, and Salmon Bay. Portions of these waterbodies are considered to be saltwater or could be considered to be part of Lake Union. For clarification, these three waterbodies should be specifically called out in Appendix III-A: Basic Treatment Receiving Waters. For the Duwamish River, areas no further downstream of river mile 6.3 (at the East Marginal Way South bridge) are within the saltwater wedge and considered to be saltwater with freshwater influence (Stoner JD. 1967. Prediction of salt-water intrusion in the Duwamish River Estuary, King County, Washington. Geological Survey professional paper 575-D. Geological Survey, US Department of the Interior, Washington, D.C.). The saltwater wedge can extend up to river mile 6.3 to 8.7 depending on flows.</p> <p>Suggested Revision For clarification, add Duwamish River (downstream of river mile 6.3), Lake Washington Ship Canal, and Salmon Bay to Appendix III-A: Basic Treatment Receiving Waters.</p>	Port of Seattle

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			Volume 1		<p>Regulatory/Permit Reference SWMMWW Volume 1, Chapter 3.2 Exemptions</p> <p><u>Pavement Maintenance Projects</u> <i>The exemptions described below may only be applied to an entire project. The entire project must be for the sole purpose of maintaining a pavement area. Pavement maintenance projects do not involve redevelopment work beyond the pavement maintenance. Pavement maintenance projects do not change the characteristics of a roadway (e.g. changing a four-way intersection to a roundabout is not a pavement maintenance project). Projects that are not solely for pavement maintenance work are not exempt from the Minimum Requirements, and must consider any pavement maintenance areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p><u>Comment #1 on Pavement Maintenance Projects</u> The purpose of pavement maintenance is to restore the original function of the pavement and does not alter stormwater runoff characteristics or change the land use. Often, the repair of damaged areas of pavement is incorporated into larger projects due to efficiencies and cost savings for mobilization, materials/supplies, etc.</p> <p>The stormwater impact for pavement maintenance is no different whether the pavement maintenance is completed as a standalone project or incorporated into a larger project. As such, the exemption should apply to any pavement maintenance practice and not just an entire project that is completed exclusively for pavement maintenance. The review process for development/redevelopment projects completed by the applicable jurisdictional authority includes the review and approval of the pavement maintenance exemption and that review would address potential to use the pavement maintenance exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p><u>Suggested Revision</u> <i>The existing language is included for Pavement Maintenance Practices in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1.</i></p> <p>Retain the existing language for the Pavement Maintenance Practices Exemption that allows for the Pavement Maintenance Practices Exemption to be applied to portions of a project, with clarification that new and/or expanded impervious area does not qualify for the exemption. If the language will be modified, it should be clarified as follows with suggested language below:</p> <ol style="list-style-type: none"> 1) The Pavement Maintenance Practices Exemption can be applied to redevelopment projects for the specified list of Pavement Maintenance Activities. <p><u>Pavement Maintenance Practices Projects</u> The exemptions described below may only be applied to a portion of a redevelopment project or maintenance/rehabilitation project an entire project. The entire project must be for the sole purpose of maintaining a pavement area. Pavement maintenance projects do not involve redevelopment work beyond the pavement maintenance. Pavement maintenance projects do not change the characteristics of a roadway (e.g. changing a four-way intersection to a roundabout is not a pavement maintenance project). Projects that are not solely for pavement maintenance work are not exempt from the Minimum Requirements, and must consider any pavement maintenance areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</p> <p>The following pavement maintenance <u>practices projects</u> are exempt from all Minimum Requirements:</p>	Port of Seattle

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			Volume 1		<p>Regulatory/Permit Reference SWMMWW Volume 1, Chapter 3.2 Exemptions</p> <p><u>Pavement Maintenance Projects</u> <i>The exemptions described below may only be applied to an entire project. The entire project must be for the sole purpose of maintaining a pavement area. Pavement maintenance projects do not involve redevelopment work beyond the pavement maintenance. Pavement maintenance projects do not change the characteristics of a roadway (e.g. changing a four-way intersection to a roundabout is not a pavement maintenance project). Projects that are not solely for pavement maintenance work are not exempt from the Minimum Requirements, and must consider any pavement maintenance areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p><u>Comment #2 on Pavement Maintenance Projects</u> The purpose of pavement maintenance is to restore the original function of the pavement and does not alter stormwater runoff characteristics or change the land use. Often, the repair of damaged areas of pavement is incorporated into larger projects due to efficiencies and cost savings for mobilization, materials/supplies, etc.</p> <p>The stormwater impact for pavement maintenance is no different whether the pavement maintenance is completed as a standalone project or incorporated into a larger project. Pavement maintenance can be conducted with other maintenance/rehabilitation activities, such as utility and railroad work. The proposed language would impact combining multiple types of maintenance/rehabilitation activities that allow for exemptions but wouldn't be able to be conducted as one project. This would lead to inefficiencies and increased costs for the maintenance and repair of existing infrastructure. As such, the exemption should allow for different types of maintenance/rehabilitation activities to be combined into a single project with the whole project provided the exemption from certain minimum requirements (e.g., a project that only includes both utility work and pavement maintenance).</p> <p>The review process for development/redevelopment projects completed by the applicable jurisdictional authority includes the review and approval of the pavement maintenance exemption and that review would address potential to use the pavement maintenance exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p><u>Suggested Revision</u> <i>The existing language is included for Pavement Maintenance Practices in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1. Update the proposed language in Appendix and Volume 1 to allow multiple exemptions to be applied to a single project.</i></p> <p><u>Pavement Maintenance Projects</u> The exemptions described below may only be applied to an entire project <u>that consists of pavement maintenance, utility work, railroad maintenance, and other exempt activities</u>. The entire project must be for the sole purpose of maintaining a pavement area, <u>installing, maintaining, and/or upgrading a utility (involving only the trenching necessary for the utility work, including any over-excavating necessary for the utility trench), and maintaining railroad tracks and associated ballast/pavement</u>. Pavement maintenance projects do not involve redevelopment work beyond the pavement maintenance <u>or other work described above</u>. Pavement maintenance projects do not change the characteristics of a roadway (e.g. changing a four-way intersection to a roundabout is not a pavement maintenance project). Projects that are not solely for pavement maintenance work <u>or other work described above</u> are not exempt from the Minimum Requirements, and must consider any pavement maintenance areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</p>	Port of Seattle

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Volume 1		<p>Regulatory/Permit Reference SWMMWW Volume 1, Chapter 3.2 Exemptions</p> <p><u>Underground Utility Projects</u> <i>This exemption may only be applied to an entire project. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench). Underground utility projects do not involve redevelopment work beyond the utility work. Projects that are not solely for underground utility work are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p><u>Comment #1 on Underground Utility Projects</u> The purpose of utility projects is to provide utilities or to restore the functionality of utilities and does not alter stormwater runoff characteristics or change the use of the land. Often, the installation, modification, upgrade, or removal of utilities are incorporated into larger projects due to cost savings for mobilization, materials/supplies, etc.</p> <p>The stormwater impact for utility projects is no different whether the utilities are completed as a standalone project or incorporated into a larger project. As such, the exemption should apply to any activity involving the installation, modification, upgrade, or removal of utilities and not just an entire project that is completed exclusively for utilities. The current review process for development/redevelopment projects includes the review and approval of the utility facility exemption and that review would address potential to use the utility facility exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p><u>Suggested Revision</u> <i>The existing language is included for Utility Projects in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1.</i></p> <p>Retain the existing language for the exemption for Utility Projects, including projects to install new utilities, which allows for the Utility Projects Exemption to be applied to portions of a project.</p> <p>If the language will be modified, it should be clarified as follows with suggested language below:</p> <ol style="list-style-type: none"> 1) The Utilities Projects Exemption, including the installation of new facilities, can be applied to redevelopment projects if the exemption criteria are met. <p><u>Underground Utility Projects</u> This exemption may only be applied to a portion of a redevelopment project or maintenance/rehabilitation project an entire project. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench). Underground Utility projects do not involve redevelopment work beyond the utility work. Projects that are not solely for underground utility work are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</p>	Port of Seattle

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Volume 1		<p>Regulatory/Permit Reference SWMMWW Volume 1, Chapter 3.2 Exemptions</p> <p><u>Underground Utility Projects</u> <i>This exemption may only be applied to an entire project. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench). Underground utility projects do not involve redevelopment work beyond the utility work. Projects that are not solely for underground utility work are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p><u>Comment #2 on Underground Utility Projects</u> The purpose of utility projects is to provide utilities or to restore the functionality of utilities and does not alter stormwater runoff characteristics or change the use of the land. Often, the installation, modification, upgrade, or removal of utilities are incorporated into larger projects due to cost savings for mobilization, materials/supplies, etc.</p> <p>Utility work can be conducted with other maintenance/rehabilitation activities, such as pavement and railroad work. The proposed language would impact combining multiple types of maintenance/rehabilitation activities that allow for exemptions but wouldn't be able to be conducted as one project. This would lead to inefficiencies and increased costs for the maintenance and repair of existing infrastructure.</p> <p>The stormwater impact for utility projects is no different whether the utilities are completed as a standalone project or incorporated into a larger project. As such, the exemption should apply to any activity involving the installation, modification, upgrade, or removal of utilities and not just an entire project that is completed exclusively for utilities. The current review process for development/redevelopment projects includes the review and approval of the utility facility exemption and that review would address potential to use the utility facility exemption inappropriately (i.e., apply the exemption when it should not be).</p> <p><u>Suggested Revision</u> <i>The existing language is included for Utility Projects in the Phase I Municipal Stormwater Permit, Appendix 1 and in the Stormwater Management Manual for Western Washington, Volume 1.</i></p> <p>Update the proposed language in Appendix and Volume 1 to allow multiple exemptions to be applied to a single project.</p> <p><u>Underground Utility Projects</u> This exemption may only be applied to an entire project <u>that consists of pavement maintenance, utility work, railroad maintenance, and other exempt activities</u>. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench), <u>maintaining a pavement area, maintaining railroad tracks and associated ballast/pavement, or any other exempt activity</u>. Underground Utility projects do not involve redevelopment work beyond the utility work <u>or other work described above</u>. Projects that are not solely for underground utility work <u>or other work described above</u> are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</p>	Port of Seattle

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Volume 1		<p><u>Regulatory/Permit Reference</u> SWMMWW Volume 1, Chapter 3.2 Exemptions</p> <p><u>Underground Utility Projects</u> <i>This exemption may only be applied to an entire project. The entire project must be for the sole purpose of installing, maintaining, and/or upgrading an underground utility, involving only the trenching necessary for the underground utility work (including any over-excavating necessary for the utility trench). Underground utility projects do not involve redevelopment work beyond the utility work. Projects that are not solely for underground utility work are not exempt from the Minimum Requirements, and must consider any underground utility work areas within the project as new or replaced hard surfaces when determining the applicable Minimum Requirements.</i></p> <p><u>Comment #3 on Underground Utility Projects</u> The Port requests that Ecology expands/clarifies the interpretation of “underground” utility projects. Utilities can be both above and below ground. Even underground utilities have an aboveground component at some point. The Port believes the exemption should clarify whether the intent is to not exempt utilities with a large aboveground component (i.e., large substations), rather than not cover overhead utilities lines (poles), electric vehicle stations, or shore power facilities. This is very relevant due to the need for electrification and upgrading utility infrastructure, shore power, and Electrical Vehicle charging stations.</p> <p><u>Suggested Revision</u> Add clarification on necessary or allowed aboveground work that can be considered as part of this exemption. This could be clarified by creating a list of allowed aboveground uses or setting a size threshold (i.e., WAC 197-11-800 has a SEPA utility exemption limit to not include substations or facilities with other voltage parameters).</p> <p>Aboveground utility work should be provided the same exemption as underground utility work. This could be accomplished by removing references to “underground” in the existing exemption or creating a new exemption for aboveground utilities.</p>	Port of Seattle

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Volume 1		<p>Regulatory/Permit Reference SWMMWW Volume 1, Chapter 3.2 Exemptions</p> <p>Comment An exemption for “Railroad Maintenance Practices” should be added to the SWMMWW Volume 1, Chapter 3.2 Exemptions to create consistency with grading codes for local jurisdictions (e.g., City of Seattle). Railroads, similar to pavement and roadways, require ongoing maintenance to continue to facility the original, intended function of the railroad. As such, railroad maintenance should be provided with the same/similar type of exemption as pavement maintenance and utility repairs/upgrades.</p> <p>Suggested Revision Add an exemption for “Railroad Maintenance Practices” to the Phase I Municipal Stormwater Permit, Appendix 1, Section 1 Exemptions as described below.</p> <p>Railroad Maintenance Practices <u>This exemption may only be applied to an entire project that consists of railroad maintenance, pavement maintenance, utility work, and other exempt activities. The entire project must be for the sole purpose of maintaining railroad tracks and associated ballast/pavement, maintaining a pavement area, installing, maintaining, and/or upgrading a utility, involving only the trenching necessary for the utility work (including any over-excavating necessary for the utility trench), or any other exempt activity. Railroad maintenance practices do not involve redevelopment work beyond the railroad maintenance work or other work described above. Projects that are not solely for railroad maintenance work or other work described above are not exempt from the Minimum Requirements, and must consider any railroad maintenance areas within the project as new or replaced hard surfaces or land disturbing activity when determining the applicable Minimum Requirements.</u></p> <p>The following railroad maintenance practices are exempt from all Minimum Requirements:</p> <ul style="list-style-type: none"> • <u>Replacing railroad ties</u> • <u>Replacing or repairing rail</u> • <u>Replacing ballast without expanding the area of coverage</u> • <u>Replacing or repairing existing asphalt, concrete, or brick pavement with asphalt or concrete without expanding the area of coverage</u> • <u>Reshaping or regrading of drainage systems or ditches</u> • <u>Vegetation maintenance</u> 	Port of Seattle

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Volume 1		<p>Regulatory/Permit Reference SWMMWW Volume 1, Chapter 3.4.6 MR6: Runoff Treatment</p> <p><i>The following TDAs require construction of Runoff Treatment BMPs. If a TDA meets any either of the following thresholds, Runoff Treatment BMPs are required. The project proponent must demonstrate that the TDA does not meet either of the following thresholds for Runoff Treatment BMPs to not be required for that TDA.</i></p> <ul style="list-style-type: none"> • TDAs that have a total of 5,000 <u>2,000</u> square feet or more of pollution-generating hard surface (PGHS), or • TDAs that have a total of 3/4 of an acre or more of pollution-generating pervious surfaces (PGPS) – not including permeable pavements, and from which there will be a surface discharge in a natural or man-made conveyance system from the site. <p>Comment #1 on MR6: Runoff Treatment The Runoff Treatment BMPs threshold of 5,000 square feet or more of pollution-generating hard surface (PGHS) should be retained in the SWMMWW. Lowering this threshold to 2,000 square feet will require the installation of Runoff Treatment BMPs for increasingly smaller areas that provide less and less environmental benefit and will result in a segmented patchwork of small Runoff Treatment BMPs being installed that are inefficient compared to Runoff Treatment BMPs installed for larger areas or regional treatment systems in general.</p> <p>Suggested Revision Retain the 5,000 square foot threshold to require treatment under SWMMWW Volume 1, Chapter 3.4.6 MR6: Runoff Treatment – TDA Thresholds.</p>	Port of Seattle

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Volume 1		<p>Regulatory/Permit Reference SWMMWW Volume 1, Chapter 3.4.6 MR6: Runoff Treatment</p> <p><i>The following TDAs require construction of Runoff Treatment BMPs. If a TDA meets any either of the following thresholds, Runoff Treatment BMPs are required. The project proponent must demonstrate that the TDA does not meet either of the following thresholds for Runoff Treatment BMPs to not be required for that TDA.</i></p> <ul style="list-style-type: none"> • TDAs that have a total of 5,000 <u>2,000</u> square feet or more of pollution-generating hard surface (PGHS), or • TDAs that have a total of 3/4 of an acre or more of pollution-generating pervious surfaces (PGPS) – not including permeable pavements, and from which there will be a surface discharge in a natural or man-made conveyance system from the site. <p>Comment #2 on MR6: Runoff Treatment Language needs to be added to SWMMWW Volume 1 that takes existing Runoff Treatment BMPs and stormwater treatment systems into consideration (e.g., treatment systems installed for ISGP compliance, etc.). Projects that occur within areas that already drain to an existing Runoff Treatment BMP or stormwater treatment system should be exempt from installing Runoff Treatment BMPs. After completion of the project, any stormwater flowing from the project area would be treated by the existing Runoff Treatment BMP or stormwater treatment system. Requiring Runoff Treatment BMPs to be installed for areas that flow to existing Runoff Treatment BMPs or stormwater treatment systems would result in “double treatment” and is not necessary. Similar to the TDA exemption for MR7: Flow Control, a TDA exemption for MR6: Runoff Treatment should be added to address projects that are within areas that already flow to a stormwater treatment system prior to discharge.</p> <p>Suggested Revision Add a new section for TDA Exemption under SWMMWW Volume 1, Chapter 3.4.6 MR6: Runoff Treatment: Runoff Treatment BMPs are not required for TDAs that discharge to an existing Runoff Treatment BMP or stormwater treatment system that provides similar water quality benefits that would otherwise be required for a given TDA under MR6: Runoff Treatment.</p>	Port of Seattle
			Volume 2		<p>Regulatory/Permit Reference SWMMWW Volume 2 BMP C153: Material Delivery, Storage and Containment</p> <ul style="list-style-type: none"> • <i>At all times, each secondary containment facility shall be covered prior to and during rain events.</i> <p>Comment Construction work occurs in Washington during rain events/wet weather. Should secondary containment facilities be required to be covered at all times prior to and during rain events, this would significantly impact the construction industry in general and the ability for construction projects to be completed. If secondary containment facilities are covered during active work hours, then the ability for construction workers to access these areas/facilities would be significantly hindered. The proposed language in BMP C153 should be modified to indicate that secondary containment facilities only need to be covered during rain events when not being actively used.</p> <p>Suggested Revision SWMMWW Volume II BMP C153: Material Delivery, Storage and Containment</p> <ul style="list-style-type: none"> • At all times <u>Throughout the year</u>, each secondary containment facility shall be covered prior to and during rain events, <u>except when in active use.</u> 	Port of Seattle

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Volume 5		<p>Regulatory/Permit Reference SWMMWW Volume 5, Chapter 5.3 General Design Criteria for Infiltration BMPs <i>Verification of Performance</i> <i>During the first 1 to 2 years of operation, verification testing monitoring is strongly recommended, along with a maintenance program that results in achieving expected performance levels. <u>The professional engineer should monitor the construction of the infiltration BMP to ensure that the work is completed in compliance with the designer's intent and the plans and specifications. Following construction, the BMP should be visually monitored quarterly over a 2-year period to assess its performance as designed. Operating and maintaining groundwater monitoring wells is also strongly encouraged. Water levels within installed groundwater monitoring wells should be monitored on a periodic interval, particularly prior to, during, and following storm events, to evaluate groundwater mounding impacts below and adjacent to the BMP.</u></i></p> <p>Comment The person required to monitor the construction of the infiltration BMP should not be limited to just the professional engineer. Many environmental regulatory requirements allow for information to be gathered/verified under the supervision of a professional engineer (e.g., Spill Prevention Control and Countermeasures, etc.) or other licensed professional such as a professional geologist or licensed hydrogeologist. The type of storm event should be specified where Ecology is recommending to check water levels at installed groundwater monitoring wells at periodic intervals.</p> <p>Suggested Revision During the first 1 to 2 years of operation, verification monitoring is strongly recommended, along with a maintenance program that results in achieving expected performance levels. The <u>A professional engineer, professional geologist, licensed hydrogeologist, or designee under their supervision,</u> should monitor the construction of the infiltration BMP to ensure that the work is completed in compliance with the designer's intent and the plans and specifications. Following construction, the BMP should be visually monitored quarterly over a 2-year period to assess its performance as designed. Operating and maintaining groundwater monitoring wells is also strongly encouraged. Water levels within installed groundwater monitoring wells should be monitored on a periodic interval, particularly prior to, during, and following storm events with at least 1 inch of rainfall in 24 hours, to evaluate groundwater mounding impacts below and adjacent to the BMP.</p>	Port of Seattle

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Volume 5		<p>Regulatory/Permit Reference SWMMWW Volume 5, Chapter 5.5 Site Characterization Criteria for Infiltration</p> <p>Summary Report <i>Provide a summary report, describing the results of the work. Include a vicinity map, an exploration site plan, and laboratory test results. Include information regarding the depth to groundwater and the presence of any limiting layers which may control groundwater flow. Consider feasibility and limitations for infiltration. Include information on how the field permeability testing was performed and the assumptions made for determining the recommended infiltration rate. The report shall be prepared by or under the direction of a licensed engineer in the state of Washington with geotechnical expertise and appropriately signed and sealed.</i></p> <p>Comment The person required to prepare the summary report should not be limited to just a professional engineer. Other professionals such as a professional geologist or licensed hydrogeologist are qualified to prepare the identified summary report and should be identified in the SWMMWW. In particular for infiltration, a geologist or hydrogeologists may have more expertise than an engineer.</p> <p>Suggested Revision Summary Report Provide a summary report, describing the results of the work. Include a vicinity map, an exploration site plan, and laboratory test results. Include information regarding the depth to groundwater and the presence of any limiting layers which may control groundwater flow. Consider feasibility and limitations for infiltration. Include information on how the field permeability testing was performed and the assumptions made for determining the recommended infiltration rate. The report shall be prepared by or under the direction of a licensed engineer, <u>geologist, or hydrogeologist</u> in the state of Washington with geotechnical expertise and appropriately signed and sealed.</p>	Port of Seattle
			Volume 5		<p>Regulatory/Permit Reference SWMMWW, Volume 5 Chapter 5.6 BMP T5.15: Permeable Pavement <u>The permeable pavement design includes a 12" layer of sand that meets the size gradation (by weight) given in Sand Medium Specification. This would meet the basic and metals treatment performance goals.</u></p> <p>Comment Increasing the requirement for the sand layer to be 12 inches instead of 6 inches could reduce the stability of the permeable pavement. Recommend providing a range thickness for the sand layer between 6 and 12 inches to allow the professional engineer to use their best judgment on what is appropriate for a given site/project.</p> <p>Suggested Revision The permeable pavement design includes a <u>6-12"</u> layer of sand that meets the size gradation (by weight) given in Sand Medium Specification. This would meet the basic and metals treatment performance goals.</p>	Port of Seattle

Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Glossary		<p>Regulatory/Permit Reference Glossary</p> <p>Replaced impervious surface For structures, the removal and replacement of impervious surfaces down to <u>(i.e. exposing the top of)</u> the foundation <u>and replacement</u>. For other impervious surfaces, the removal down to <u>(i.e. exposing the top of)</u> bare soil or base course and replacement.</p> <p>Comment For structures, demolishing a building or other structure and leaving the foundation intact and exposed to stormwater should not constitute a replaced hard surface. Demolishing a structure or building is not a land disturbing activity and does not actually replace any impervious surface, it merely exposes what already exists to the elements. Often demolition projects are removing an older pollutant-generating roof or structure, which would be an improvement for stormwater quality. The requirements for structures to be included under replaced impervious surface should be limited to when the foundation itself is replaced.</p> <p>Suggested Revision For structures, the removal down to <u>and replacement of (i.e. exposing the top of)</u> the foundation and replacement. For other impervious surfaces, the removal down to (i.e. exposing the top of) bare soil or base course and replacement.</p>	Port of Seattle