

City of Kent

There are many new requirements for tracking/documenting information throughout the draft permit. This seems excessive, specifically the requirements listed below as the main examples:

- S5A.3.a - Stormwater Management Program - track cost of development and implementation of each component of the SWMP.
- S5.C.3.a - Public Involvement and Participation - document specific public involvement opportunities provided to overburdened communities and methods used to identify overburdened communities.
- S5.C.9.e.vi - Operations and Maintenance - document the road type and level of traffic served (e.g. AADT or estimated # of vehicles served) of the roads swept, frequency, type of sweeper, lane miles, a map of the areas and land uses swept, and approximation of street waste removed.

The City does not currently track most of this information. These new mandates will take up valuable staff time and other resources that would be better utilized to implement the programs that prevent pollutants from entering our waterways.

Is all of this information necessary? If so, what will it be used for? How does this data collection protect water quality?

S2.B.3.a - Non-stormwater Discharges

The Department of Ecology should be responsible for working with firefighting agencies/departments directly to develop a PFAS management plan. It should be handled like an industrial permit. The City has no authority over the Puget Sound Regional Fire Authority.

S5.C.9.b.iii – Operations and Maintenance

What is meant by "qualified third party" – is there going to be a standard or certification course?

S5.C.9.d.xv Operations and Maintenance, Building Exterior Cleaning and Maintenance

Permittees will not be able to determine if many buildings were built or renovated between 1950-1980 since most of these older buildings will not have available plans. Some properties were acquired through annexations and Permittees will likely not have the information needed to verify the age of some buildings.

Appendix 1 - 4.6 Minimum Requirement #6: Runoff Treatment

Appendix 1 of the MS4 Permits, revised threshold discharge areas new impervious surface limit from 5,000 sq ft to 2,000 sq ft. This is a significant change for many capital projects, most of which are improving existing infrastructure which is failing and often come close to the 5,000 sq ft new impervious limit. Implementation of this rule would have a negative impact on the Permittees ability to effectively maintain road infrastructure. The cost of minor improvements or repairs would increase substantially, as the cost of the required stormwater facilities would likely be greater than the roadwork itself. This change may likely result in less projects (and stormwater improvements) getting completed due to already limited Capital funds. This also has an impact on private development, most notably invested costs to single family homes.

Appendix 1 - Pavement Maintenance Projects

This exemption is too restrictive because it increases agencies costs when completing important

improvements such as safety and ADA accessibility. At a minimum, please clarify that other work associated with pavement maintenance projects that does not increase capacity or impervious areas is allowed. Kent supports exemptions for the following types of work:

- ADA Ramp retrofits
- Traffic Signal retrofits
- Roadway illumination
- Guardrail and Barrier installation
- Roadway narrowing to repurpose existing paved lanes for bike and pedestrian or other use
- Other similar work