

## Phase I & WWA Phase II Modification Comments

Permit	Section	Page	Comment
WWA Phase II	Definitions and Acronyms Draft Definition	5-6, 8, 9 & 67	<p>This comment pertains to the definition of "discharge point" and the definition guidance regarding discharge points. Page 5-6 of the draft Definition Guidance states that "For discharge points to ground: [the definition of Discharge Point] Includes facilities/BMPs that inadvertently infiltrate, such as ditches and swales"</p> <p>However, in regard to ditches, the mapping guidance on page 6 and examples given on pages 9 and 11 of the Definition Guidance state that ditches do <b>not</b> need to be mapped as Discharge Points.</p> <p>For the following reasons, we encourage Ecology to tighten the definition of "discharge point" and clarify the Definition Guidance to <b>exclude</b> ditches in all cases (not just for mapping purposes) from the definition of a discharge point to ground.</p> <ol style="list-style-type: none"> <li>1) Typically, ditches are part of the conveyance system, not a facility or BMP (as specified in the guidance noted above).</li> <li>2) The use of "Inadvertent infiltration" is arbitrary.</li> <li>3) "Infiltration to ground" should be based on the design intent of the feature. Ditches are typically designed as part of the conveyance system, not infiltration, unless specifically designed otherwise.</li> </ol>
WWA Phase II	Guidance 8.14.14	10	