

## Phase I & WWA Phase II Modification Comments

Permit	Section*	Page*	Comment
Both	S5.C.4.a	26	In the last sentence of the first paragraph appearing, we suggest adding the word "completed" prior to " <u>applications submitted</u> prior to January 1, 2017, which have not . . . ." For consistency, these edits should also apply to the paragraphs pertaining to Lewis and Cowlitz Counties and the City of Aberdeen.
Both	S5.C.4.a	26	In <i>footnote 19</i> , we suggest adding the word "completed" prior to " <u>applications submitted</u> prior to January 1, 2018, which have not . . . ."
Both	S5.C.4.g	32-34	While Thurston County is not directly effected by this permit obligation, we are aware of challenges and polarization that has emerged surrounding this obligation. In reflecting on this, we cannot help wonder if this situation could have been avoided if a different approach was taken to the permit development process. An alterative approach that works to foster a setting were Ecology, permittees, and stakeholders can collectively explore options to achieve mutual gain. Thurston County, along with likeminded permittee, will soon take steps to advocate for embracing such an approach during the development of the reissuance of the next round of municipal stormwater permits.
Both	S6.D.4.d	43	We question how practical it is to visually inspect piped and subsurface <i>discharge points</i> for illicit discharges. As such, we suggest the visual inspection requirement only apply to surface <i>discharge points</i> .
Both	Definitions and Acronyms: <i>Discharge Point</i>	67	To avoid confusion, we suggest the term <i>discharge point</i> also apply to discharges to ground that occur via MS4 facilities/BMPs designed to infiltrate stormwater (as oppose to referring to those at <i>outfalls</i> ). Creating a distinction between discharges occurring over the ground via a "discharge point" and "into" the ground (i.e., groundwater) via an "outfall" will create confusion, particularly since the definition of "stormwater" includes "interflow" which implies that the infiltration stormwater may never actually reach groundwater. This confusion could be eliminated if the definition of <i>outfall</i> pertained only discharges to surfaces <i>receiving waterbodies</i> or <i>receiving waters</i> .
Both	Definitions and Acronyms: <i>Outfall</i>	70	To avoid confusion, we suggest the term <i>outfall</i> only apply to discharges from MS4s entering a <u>surface</u> receiving water body or receiving waters. Creating a distinction between discharges occurring over the ground via a "discharge point" and "into" the ground (i.e., groundwater) via an "outfall" will create confusion, particularly since the definition of "stormwater" includes "interflow" which implies that the infiltration stormwater may never actually reach groundwater. This confusion could be eliminated if the definition of <i>outfall</i> pertained only discharges to surfaces <i>receiving waterbodies</i> or receiving waters.

If Ecology decides to refer to discharges occurring via MS4 facilities/BMPs designed to infiltrate stormwater as part of the definition of *outfall* rather than *discharge point* as suggested in our previous comment, we recommend amending the definition of *receiving water body* and *receiving waters* as follows to help make the connection to the revised *outfall definition*: "means naturally and/or reconstructed naturally occurring surface water bodies, such as creeks, streams, rivers, lakes, wetlands, estuaries, and marine waters, to which a discharge occurs via an outfall or via sheet/dispersed flow. Receiving waters also include groundwater to which a discharge occurs via facilities/BMPs designed to infiltrate stormwater via an *outfall*."

Definitions  
and  
Acronyms:  
*Receiving  
water body  
or receiving  
waters*  
Appendix 1:

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*Discharge  
Point*  
Appendix 1:

3 See comments provided previously on *line 7*

*Outfall*

5 See comments provided previously on *line 8*

Appendix 1:  
*Receiving  
waterbody  
or Receiving  
waters*

6 See comments provided previously on *line 9*

\*While the comments pertain to both permits, the *Section* and *Page* numbers reference those in the redline version of the Western Washington Phase II permit.

## WWA Stormwater Manual Modification Comments

Volume	Section	Page*	Comment
V	BMP T5.15	5-21	"We support an approach which allows local jurisdictions to define what constitutes "very low traffic volumes or low truck traffic."
V	BMP T5.15	5-22	Guidance to designate geographic areas as infeasible should apply to all the manual's infiltration BMPs and should also allow for the inclusion of the other infeasibility criteria common to the various infiltration BMPs.
V	BMP T7.30	7-9	Guidance to designate geographic areas as infeasible should apply to all the manual's infiltration BMPs and should also allow for the inclusion of the other infeasibility criteria common to the various infiltration BMPs.
V	BMP T7.30	7-6 & 19	A distinction should be made that allows elevated underdrains incorporated for overflow purposes to satisfy Minimum Requirement #5.

\*Page numbers reference those in the redline version of the SWMMWW.