

## **Informal Comments from the City of Covington on the Western Washington Phase II Municipal Stormwater Permit Reissuance**

The City of Covington supports the comments submitted by the Regional Road Maintenance ESA Forum and would like to add the following:

### **Municipal Stormwater General Permit reissuance preliminary draft language.**

Comments on proposed changes to Section S5.C.4

- a. Change effective date of ordinance adoption from December 31, 2015 to December 31, 2016 to reflect the passage of House Bill 1478.
- iv. (1) Change proposed language from “require LID principles and Best Management practices (BMP’s) to the maximum extent practicable” to maximum extent feasible to reflect feasibility language in the proposed Appendix 1 document.
- (2) Clarify the need for submitting a summary of the review and revision process for implementing LID requirements. What is the intended use for the summary? What is the benefit of collecting summaries from permittees of all revisions, amendments and changes to codes, and updates to standards and rules, after they have been implemented?
- b.v. Continuing the 80% inspection minimum due to economic down turns is appreciated. With the elimination of the 1 acre threshold, there is a potential for more BMP installations on more project sites. Reduced inspection levels may result in improperly installed and non-functioning BMP’s that will negatively impact water quality which defeats the purpose of Section S5.C.4 of the Permit.

Comments on proposed changes to Section S8

- C.2. - Covington is in support of monitoring payment Option 1. The cost of regional monitoring should be shared equally based on population.
- The proposed first payment due date of August 15, 2013 is manageable.
- There should NOT be an “opt out” option for the effectiveness studies component. In order for the Regional Monitoring to be successful and generate useful/valid information, jurisdictions must participate in all aspects of the program.

### **Comments on proposed changes to Appendix 1**

- Page 24. LID Performance Standards – The Flow regime performance standards proposed for LID, 8% of the 2-year peak flow to 50% of the 2-year peak flow, are unattainable through stormwater management without modifying land use. The NPDES permit should not be the driving force behind land use changes. Permit should reflect existing GMA requirements and not try to modify them.

Please refer to the letter submitted by the Regional Road Maintenance ESA Forum for additional comments on Appendix 1.