

From: [Robert Dashiell](#)
To: [SW Permit Comments](#)
Subject: Draft Municipal Stormwater Permit Comments
Date: Friday, February 03, 2012 12:32:43 PM

This public comment is for: Western Washington Phase II Municipal Stormwater Permit

Comment regarding: Pages 36, 37.

Subject: Catch basin inspection and cleaning requirements should be tightened up. "..."the Permittee may substitute substitute written statements to document a specific , less frequent inspection schedule." That is almost the same as saying if you don't do the inspections, just give us a statement. That isn't going to clean up stormwater, and knowing the City I live in, they will take full advantage of that. Last year, they cleaned less than one in every twelve catch basins. I could not obtain the inspection/did not clean records.

Last year, the EPA had a draft proposal to divide catch basin up into three categories ... a seemingly logical hierarchy of inspection and cleaning requirements. They had proposed (draft) the most critical catch basins be inspected/cleaned three times a year. It also required storm drains to be labeled and number identified so somebody who sees something amiss can give a number to the City.

I am not an expert on catch basins. I am a photographer, and when I seen a virtually totally plugged or trash filled catch basin, I report it. I'm reporting too many, and that should be my job as a private citizen. (No, I don't report leaves)

Most catch basins do not have fiber filters ... the small trash like cigarette butts and paper and plastic trash just go into the MS4 system.

Maybe that isn't all that important to DOE, and maybe that doesn't do harm to waterways, but I feel catch basins need tighter mandatory inspection and cleaning, and I think they are treated too lightly in this draft permit.

And, DOE might consider if some rodent guards an be installed on outfalls of a certain size? That's just based on a couple of observations of rats and raccoons who apparently seem to like the pipes as low income shelter with running water.

I do not know if that is a common problem or not ... it just bothers me to see that (infrequently) where I live.

Respectfully,

Robert Dashiell
6370 NE Tolo Road
Bainbridge Island, WA 98110
206-855-8112