



City Of Kenmore, Washington

February 3, 2012

Harriet Beale
WA State Department of Ecology
Water Quality Program
PO BOX 47696
Olympia, WA 98504-7696

**Re: Draft Western Washington Phase II Municipal Stormwater Permit (2012 - 2013)
Public Comment Period 12/19/2011 to 2/3/2012**

Ms. Beale,

The City of Kenmore would like to thank you for the opportunity to comment on the draft municipal stormwater permit. The City has reviewed the draft 2012 - 2013 Western Washington Phase II Municipal Stormwater Permit and has the following comments:

City of Kenmore Comments

The timelines mentioned in the 2007 Western Washington Phase II Municipal Stormwater Permit do not make sense in the draft 2012 Western Washington Phase II Municipal Stormwater Permit. The draft Permit, which will only span 1 year, contains timeline language spanning 5 years.

S5.C1 (Public Education and Outreach)

No public education and outreach activities will be required during the implementation of this permit (all requirements are after 1 year of the effective date of this Permit).

S5.C2 (Public Involvement and Participation)

Requirement S5.C2.a is to be met no later than 1 year from the effective date of the Permit, however, the Permit expires 1 year from the effective date.

S5.C3 (IDDE)

Permittees must fully implement a program no later than 180 days prior to the expiration date of the Permit, however, all of the program elements are not required until after 1 year beyond the effective date of the Permit.

S5.C4 (Controlling Runoff)

Only section S5.C4.d is required within 1 year of the effective date of the Permit (record keeping of enforcement actions). No other runoff control requirements are required during the implementation of this Permit.

S5.C5 (Operations and Maintenance)

All catch basins are required to be inspected and cleaned before the end of the permit term (S5.C5.d), however, subsection *d* falls under the minimum performances language of the main section, which is prefaced with the statement that the O&M program isn't required until 3 years after the effective date of the Permit. S5.C5.e (inspection compliance) also falls under this same situation because it states that 95% of inspections shall be completed no later than 180 days prior to the expiration of the Permit (sometime around February 2013).

18120 68th Ave NE · PO Box 82607 · Kenmore, WA 98028

Office: (425) 398-8900 · Fax: (425) 481-3236 · cityhall@kenmorewa.gov · www.kenmorewa.gov

S9 (Reporting)

Without changes made to the timeline, this section does not make sense.

If you have any questions or comments, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Richard Sawyer', with a long horizontal stroke extending to the right.

Richard Sawyer
Surface Water Program Specialist
425-398-8900
rsawyer@kenmorewa.gov