



City of Seattle
Seattle Public Utilities

February 1, 2012

Municipal Permit Comments
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

Re: City of Seattle Comments on the 1-Year (2012-2013) NPDES Phase I Municipal Stormwater Permit

Dear Ms. Graul,

Seattle is submitting the comments below on the 1-Year (2012-2013) NPDES Phase I Municipal Stormwater Permit to be considered by Ecology.

Seattle suggests that Ecology change the language that reads "the effective date of this permit" to "February 16, 2007". This change is suggested to keep the schedule for implementation of programs initiated under the 2007 permit consistent in the 1-year permit term (August 2012 to August 2013). This change is needed throughout the permit.

Seattle suggests that Ecology remove the language in Special Condition S5.C.8.b.iv(1) on page 26 that reads: "Each City covered under this permit shall prioritize conveyances and outfalls and complete field screening for at least 60% of the conveyance systems within the Permittee's incorporated area no later than 5 years from the effective date of the permit". Seattle suggests that this language be replaced with:

"Each City covered under this permit shall prioritize conveyances and outfalls and complete field screening for at least 12% of the conveyance systems within the Permittee's incorporated area during the term of this permit."

This clarifies the Permittee's responsibilities during this 1-year permit term and meets the intent of Ecology and the Legislature by maintaining the current level of SWMP effort towards IDDE screening (60% divided by 5 years = 12%).

We hope that our comments will be helpful in finalizing the 1-Year (2012-2013) permit and we look forward to working with Ecology and the public on implementation of the Stormwater Management Program.

Ray Hoffman, Director
Seattle Public Utilities
700 5th Avenue, Suite 4900
PO Box 34018
Seattle, WA 98124-4018

Tel (206) 684-5851
Fax (206) 684-4631
TDD (206) 233-7241
ray.hoffman@seattle.gov

<http://www.seattle.gov/util>

An equal employment opportunity, affirmative action employer. Accommodations for people with disabilities provided on request.

Cordially,



Nancy Ahern, Director
Utility System Management Branch
Seattle Public Utilities

Cc: Bruce Bachen, SPU
Ingrid Wertz, SPU
Kevin Buckley, SPU
Theresa Wagner, City Attorneys Office