City of Seattle
Paul Schell, Mayor

Seattle Public Utilities
Diana Gale, Director

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WATER QUALITY
PROGRAM

December 8, 1998

Megan White, Program Manager
Water Quality Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Megan:

The enclosed document provides the clarifications as requested by Ann Wessel of your staff regarding our NPDES Stormwater permit Third Year Report. With these clarifications, we anticipate approval of our Third Year Report.

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for willful violations.

If you have any questions regarding this matter, please feel free to contact Darla Elswick of my staff at (206-233-7160).

Sincerely,

Timothy Croll
Resource Planning Director
Seattle Public Utilities

Enclosure

cc: Ann Wessel, DOE

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Clarification Items
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ITEM 1: STORM EVENT MONITORING

Annual Report:

Section entitled "Storm Event Monitoring" describes monitoring activities related to Longfellow Creek, Thorton Creek, and BMP Effectiveness Study.

Clarification:

The monitoring activities described under "Storm Event Monitoring" should be entitled "Additional Storm Event Monitoring". These monitoring activities represent opportunities the City of Seattle has taken, beyond the permit requirements, to take a more proactive role in storm event monitoring.

Storm Event Monitoring, as outlined in the Stormwater Management Program, was not successful for many parameters during the 1997-98 wet season. Difficulties with equipment, limited staffing, and the lower than average precipitation season of 97-98 proved an obstacle to collecting storm event samples that met all QA/QC requirements. However, Aquatic Community Assessment monitoring was achieved and is described in the section entitled "Monitoring Program, Aquatic Community Assessment Program."

ITEM 2: DISCUSSION OF UNMET NEEDS

Annual Report: "Among the issues being addressed are:....."

Clarification:

The sentence should read "The Unmet needs listed in the Stormwater Management Program currently being addressed are: 1) Assessment of Unmet Needs, 2) Evaluation of sediment control at construction sites, 3) Mobile business as sources of nonpoint pollution, 4) Retrofitting of structural BMPs, 5) Development of business inspection program, 6) development of creek restoration program, 7) development of Thorton Creek Watershed Action Plan, 8) Evaluation of SWMP effectiveness, 9) evaluation of wetland BMP, 10) review of enforcement procedures, and 11) private detention inspection program." Progress on these Unmet needs is described in the following paragraphs.

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Assessment of Unmet Needs- See ITEM 3.

Evaluation of sediment control at construction sites- After a workload evaluation in 1998, DCLU determined that their existing staff was not adequate to address sediment control at construction sites. Consequently, DCLU will use new personnel, commencing in early 1999, to address sediment control at construction sites. See Annual Report section entitled "Department of Construction and Land Use Inspection Services Division".

Mobile business as sources of nonpoint pollution- To address mobile sources of nonpoint pollution, SPU staff identified the types of businesses that pollute and are dominantly mobile. Subsequent efforts will focus on methodologies to best minimize pollution from these businesses (e.g., inspections, education). The mobile business effort represents a subset of the developing Business Inspection Program.

Retrofitting of structural BMPs- As per Ecology Grant Agreement G9500232, a study has been developed to test retrofitting of urban structural BMPs. Sampling is expected to commence during the 98/99 wet season.

Development of business inspection program- Described in Annual Report under the section entitled "Treatment and Source Control Measures (S7.B.8.B of the NPDES Permit)." The information provided in the Annual Report represents on-going efforts by SPU to develop an industry-based inspection program.

Development of a creek restoration program- The Urban Creeks Initiative, described in the Annual Report under "Other Activities", essentially represents the foundation of the City's creek restoration program. The Initiative coordinates various creek-related efforts (e.g., education, restoration efforts, field studies) to create a comprehensive approach to creek restoration.

Development of Thorton Creek Watershed Action Plan- described in Annual Report under section entitled "Public Participation."

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Evaluation of SWMP effectiveness- SPU is currently investigating potential opportunities to evaluate SWMP effectiveness. SPU has identified key elements of program work, Capital Improvement Projects, and other Initiatives as priorities to meet Department and City goals. As such, performance measures have been established to track progress and ensure execution; several of these measures will impact elements of the SWMP. In the first quarter of 1999, SPU will compile those measures related to the SWMP and create a tracking and reporting format for them.

Evaluation of wetland BMP- Currently, a water quality sampling plan is being developed to investigate the effectiveness of utilizing BMP detention ponds for stormwater treatment. The site to be investigated is Meadowbrook Pond located in the north eastern portion of Seattle. Sampling is expected to commence in Spring or Fall 1999, depending on project progress and weather conditions.

Review of enforcement procedures- Water quality enforcement procedures were evaluated in 1998. Currently, where water quality violations are identified, an educational approach is taken to correct the situation. SPU staff typically work with water quality offenders to teach proper water quality protection practices. However, a review of water quality enforcement procedures resulted in the identification of a need for stronger enforcement methods. Consequently, SPU and the City Law Department, have been working on developing an enforcement protocol. This protocol will allow SPU staff to follow consistent procedures when water quality violations have occurred, including the issuance of "Notices of Violation" and "Stop Work Orders." This enforcement protocol is expected to be implemented in 1999.

Private detention inspection program- described in Annual Report under "Inspections, Private stormwater detention system inspections". This program represents an on-going effort by the City.

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ITEM 3: IDENTIFICATION OF UNMET NEEDS

Annual Report:

"A system for evaluating and prioritizing needs has been implemented."

Clarification:

SPU currently utilizes several methods to identify and prioritize Unmet Needs:

1) The 1995 Comprehensive Drainage Plan provides criteria for the selection of Capital Improvement Projects (CIP). Included in these criteria is a water quality component, which evaluates a proposed project in light of water quality needs.

2) The Drainage System Lateral Team (DSLT), comprised primarily of upper-management SPU personnel, meets twice monthly to discuss drainage-related issues. One function of DSLT is to identify important drainage needs located throughout the organization (e.g., Community Services, Resource Management, Engineering Services). Once identified, the DSLT develops an approach to address the issue(s) at hand.

3) A Stormwater Technical Team meets monthly to address issues related specifically to stormwater. The group includes City staff from SPU, Department of Land Use and Construction (DCLU), and SEATRANS. By pulling together various City personnel involved with stormwater issues, this group is a valuable tool in identify stormwater needs on a City-wide basis. Issues identified by the Stormwater Technical Team may be presented to the DSLT for further action recommendations.

4) The Watershed Action Plans (described in the Annual Report under "Public Participation") are another vehicle used to identify stormwater-related unmet needs. Using a watershed approach, the Action Plans allow specific needs to be identified as they relate to unique areas of the City.

5) Creeks, Drainage, & Wastewater Advisory Committee (CDWAC)- See section in Annual Report entitled "Public Participation, Citizen Advisory Committees." Among other tasks, this newly-formed committee (1998) acts to review stormwater-related issues within the City and provides input to SPU. By delineating key issues, CDWAC will be instrumental in the identification and prioritization of Unmet Needs.

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ITEM 6: FISCAL TRACKING

Annual Report:

See Annual Report section entitled "Revisions to Fiscal Analysis"

Clarification:

In addition to information provided in the Annual Report, the City is currently revising it's accounting system. These changes will result in improved methods of fiscal tracking for Stormwater Management Program expenditures. The new accounting method will be implemented in 1999.