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Subject Comments on DC MS4 Permit

Comments on DC MS4 Permit from Z. John Licsko DC_MS4_Comments.doc

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Item	Section	Questions or Comments on DC Draft MS4 Permit
1.	4.1.1.a (i) & 4.1.1.b (i)	What is the recurrence interval for the 24 hour storm in these sections?
2.	5.1 (1)	Annual loading estimates for pollutants should be based on the hydrologic, and not the calendar year, and should include a statistically representative estimate of annual pollutants loads that considers the pollutant load from both storm events as well as base flow conditions. The reporting of these loading estimates needs to include a reference to a background or reference loading estimate. In DC's case this is would be the loading from a predevelopment condition that assumes a meadow condition.
3.	5.2 (2)	An assessment of the biological health of a system needs to include not only a biological or physical assessment of a sites health relative to a reference condition, but a consideration of the biological integrity of the sampling site which includes it's biological connectivity to downstream aquatic habitats, the health, extent and connectivity of riparian habitat, the effects of hydrologic alterations, the effects of changes in the quality and availability organic matter in the stream, the effects of shading and temperature, as well biological fragmentation (i.e. absence or over abundance of predators or competing evasive species). These variables making the interpretation of macro invertebrates sampling and/or physical indicators and trends difficult, if not impossible
4.	5.1 (3) 1. B	For what time frame are the "event mean concentrations" being reported for?
5.	4.1.3 (2)	The interception of rainfall by a mature tree canopy will not provide water quality benefits. A reduction in runoff volume due to interception will only result in an increase in the concentration of pollutants in runoff, when it does occur. In fact, while there may be other benefits, an increase in tree canopy will likely result in an higher annual loading for pollutants such as total phosphorus, nitrogen and total suspended solids.
6.	4.1.4 (2)	How will the performance standard for green roofs be related to water quality improvements?
7.	4.3.4 (10)	An evaluation of the appropriateness in an urban environment, of the application loading rates as well the types of pesticides used by commercial applicators needs to be completed. Pesticides loading rates based on agriculture uses are not necessarily appropriate in an urban setting. The evaluation also needs to include a review of the risks versus the benefits of pesticide being used
8.	4.2.2	What level of non-compliance with storm water controls will be considered acceptable?
9.	5.2.1	How does the proposed sampling schedule support the development of annual EMC value for the monitoring parameters in Table 3?
10.	5.2.2	Storm Event Data needs to include a summary all rainfall and runoff event occurring during a monitoring year (preferably hydrologic year) , not just for sampled events. Without this data it is impossible to assess the representativeness of the sample that are collected.