Informal Comments on the PRELIMINARY DRAFT Municipal Stormwater Permits (Phase I, Eastern and Western Phase II) and Stormwater Management Manuals (Eastern and Western) October 17 - December 2, 2022

PRELIMINARY DRAFT TOPIC (select from drop down)	Comment	Comment Made By
MS4 Permit: Mapping	Yes, we agree that you should require standardized mapping of all outfalls in a publicly accessible central database. Please include the mapping of tributary conveyances to the outfalls.	Jamestown S'Klallam Tribe
MS4 Permit: Tree Retention	We agree that tree canopy should be documented and that tree canopy retention and restoration measures are implemented. The setting of canopy restoration levels needs to be, at a minimum, 1995 levels, when we reached the tipping point of CO2 sources vs sinks. There should be a 10 year restoration period to reach 1995 canopy coverage levels.	Jamestown S'Klallam Tribe
MS4 Permit: Sweeping	 All paved surfaces contributing to water bodies that are impaired by toxic chemicals, including rivers and streams discharging to 303d-listed marine waters. All paved surfaces within commercial and industrial land use areas, including within MICs All paved surfaces contributing to water bodies with ESA-listed stocks of salmonids. All paved surfaces contributing to water bodies where pre-spawn mortality of coho salmon has been identified. 	Jamestown S'Klallam Tribe
MS4 Permit: PCBs	Although education and outreach are a good beginning, areas with the highest PCBs, such as commercial and industrial zones need to be forced to install bioretention storm water infrastructure to really address PCBs. All stormwater basins in these areas need to have PCBs monitored. We agree with Ecology's intent to add specific requirements around addressing PCBs in building materials.	Jamestown S'Klallam Tribe
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	We agree with reducing project thresholds to increase the amount of urban lands receiving treatment of stormwater runoff. This will address 6PPD-quinone as well as the toxic soup of contaminants found in runoff from transportation, commercial, industrial, and residential lands. Additionally, we agree with the proposed changes for replacing surfaces for road and commercial/industrial projects. We suggest that the trigger for additional surfaces be decreased from 5,000 square feet to 2,000 square feet.	Jamestown S'Klallam Tribe