

**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: Tree Retention	The proposal is beyond the scope of a permit that authorizes discharge of stormwater from the municipal separate storm sewer system. A requirement to document landscape canopy cover and riparian tree canopy cover is overreach because canopy cover is not connected to the municipal separate storm sewer system. The adoption and implementation of tree canopy retention/restoration objectives should be addressed by the growth management act and comprehensive plan updates, not the NPDES permit.	City of Renton
MS4 Permit: Tree Retention	In the proposed language, "existing" cover needs adjustment to allow flexibility. Our jurisdiction analyzes canopy cover every five years, next in 2023, so the term and timeframe for reporting must account for this as well as data collection and publication of aerial photos and LIDAR imagery which may be updated every 3 to 4 years.	City of Renton
MS4 Permit: Tree Retention	The date for adopting tree canopy retention/restoration objectives should be specified by the Growth Management Act and comprehensive plan update deadlines, not the NPDES permit. GMA deadlines may shift, so no deadline or requirement should be specified in the permit.	City of Renton
MS4 Permit: PCBs	The Phase I and Phase II permit language is written differently for S5.C.2.a.i, but is shown as the same in the preliminary draft. Retain the language in the current Phase II permit: "i. General awareness. To build general awareness, Permittees shall annually select at a minimum one target audience and one subject area from either (a) or (b):"	City of Renton
MS4 Permit: PCBs	Ecology needs to provide pollution prevention plan guidance for a lay person who washes a building to understand and implement. The 59-page guidance document is too complex to use.	City of Renton
MS4 Permit: PCBs	Ecology needs to provide at least a year to amend city code to change conditionally allowable discharge language; preferably align this date with the updated manual adoption. A longer time period is needed to assess building dates and provide education and technical assistance for pollution prevention plan guidance for buildings built between 1950-1980.	City of Renton
MS4 Permit: PCBs	Ecology needs to provide at least a year to allow for staff training prior to implementing practices, policies, and procedures associated with PCB materials. This time period is needed to assess building dates and provide training and pollution prevention plan guidance for buildings built between 1950-1980.	City of Renton
MS4 Permit: Sweeping	In the reference Cavillo et. al., no peer reviewed studies were evaluated, but almost all of the studies reviewed were government reports which indicate a lack of scientific rigor and bias. This report shouldn't be a credible source to make the case for a street sweeping requirement.	City of Renton
MS4 Permit: Sweeping	The referenced SPU study showed an export of fine sediments, nitrate, and nitrite due to street sweeping. It also showed that the particle sizes with the greatest reduction due to street sweeping are also the sizes that are captured in catch basins. Based on this report, street sweeping is a redundant effort for removal of sediments which are captured in catch basins and is a pollutant source for fine sediments, nitrate and nitrite. This report shouldn't be a credible source to make the case for a street sweeping requirement.	City of Renton
MS4 Permit: Sweeping	The poor quality of the reference materials do not support Ecology's claim that street sweeping studies "indicate that [street sweeping] is an effective stormwater management tool that provides water quality benefits in receiving waters". This topic requires convincing scientific evidence from multiple, local (Western Washington) studies that show street sweeping is not a source of pollution, is not a redundant operation to remove pollutants which current infrastructure manages, and will improve water quality in the receiving water.	City of Renton
MS4 Permit: Sweeping	If the requirement is included in the permit, amend the language to specify that streets or roads are to be swept, not areas or basins. Areas or basins without curb and gutter should not be included in the street sweeping program.	City of Renton

MS4 Permit: Sweeping	If the requirement is included in the permit, the initial date should be set to the beginning of 2028 at the earliest since three sweeping cycles are needed in the year. If the program starts in July, only one sweep cycle should be required for the rest of the year.	City of Renton
MS4 Permit: Sweeping	If the requirement is included in the permit, Ecology should allow for the purchase of street sweepers from the SFAP and capacity grant funding sources.	City of Renton
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	The proposed redevelopment thresholds will cause a significant increase in costs for stormwater management which could delay or cancel projects. These added costs have negative implications for roadway projects that are needed to protect public safety. If the requirement is included in the permit, provide additional funding for grants and loans on these projects.	City of Renton