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	Can the benefits of this requirement be quantified? If so, is it shown in any study conducted in Eastern Washington (Semi-arid climate)	City of Pasco
MS4 Permit: Tree Retention	Additional clarification is needed regarding the approved methods to document canopy density. Can the additional O&M cost or need for an additional full-time employee be justified, since there are not any studies done showing the benefits in a semi-arid climate.	City of Pasco
MS4 Permit: Tree Retention	Additional information is needed regarding the expected frequency for canopy density documentation; if frequency is provided, is it supported by any study conducted in Eastern Washington?	City of Pasco
MS4 Permit: Sweeping	Can Ecology explain the method used to determine that a minimum of three sweeps per year for all streets provides the most benefit? Should lower sweeping frequencies be proposed for smaller/low traffic streets? The Cities should be able to determine sweeping frequency based on their knowledge of their storm system and weather.	City of Pasco
MS4 Permit: Sweeping	Can Ecology provide a defenition for "Areas identified as high priority".	City of Pasco
MS4 Permit: Sweeping	Documentation requirements seem excessive, and will increase O&M cost; why is Annual Average Daily Traffic (AADT) required for every street?	City of Pasco
MS4 Permit: Appendix 1 (Eastern Phase II)	Construction Site Stormwater Runoff Control. The following segment was removed: “That disturb one acre or more, and”; can Ecology add a definition for “Construction Project” what type and size of project will need to be taken into consideration when implementing and enforcing runoff control BMPs.	City of Pasco
MS4 Permit: S8 (Eastern Phase II Only)	Providing options for permittees to comply with S8. Monitoring and Assessment is an improvement to S8.	City of Pasco
MS4 Permit: PCBs	The City does not have the experience to educate private parties in the proper handling of PCBs. Will ecology provide protocols and/or education material to properly conduct PCBs education?	City of Pasco