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: Sweeping	Curb miles would be difficult to track for many jurisdictions. Streets are currently not mapped by curb and gutter so time would be needed to gather and post this information if needed. The City of Bothell recommends that lane miles be used as a measurement and this approach would provide a more accurate understanding of sweeping associated with multi-lane roads.	City of Bothell
MS4 Permit: Sweeping	Disposal of sweeper waste is becoming a larger issue each year due to regional facility capacity and hauling required. Our existing decant facility is at capacity, so any additional sweeping materials will require extensive hauling to regional facilities which causes us to generate more trips and takes away staff and resources from other important water quality activities. Analysis should be conducted to determine whether facilities have the capacity to take care of the additional waste materials, or Ecology should assist with permitting new regional facilities to process the additional hazardous waste.	City of Bothell
MS4 Permit: Tree Retention	Please allow for at least 2-3 years for municipal code requirements to be implemented. These changes require us to coordinate with several other departments, create or update vegetation datasets, bring options to our boards and commissions, propose changes to Council and then have them adopted. Any changes to our planning code in riparian areas outside of comprehensive plan updates require us to reconvene boards and commissions which adds an additional layer of complexity. This requirement should allow for flexibility if jurisdictions already have tree canopy retention codes or policies in place.	City of Bothell
MS4 Permit: Tree Retention	Currently, several surrounding cities join Bothell in capturing aerial imagery which would be used for this purpose. We currently require "leaf-off" flyovers because we need to see infrastructure and impervious surface areas for calculating and reporting other required permit related data. "Leaf on" imagery can be captured but requires additional professional services and cost to gather and process this tree canopy information. We currently conduct imagery capture every four years, so would appreciate flexibility in timing of initial documentation and analysis to align with current activities and budget cycles.	City of Bothell
MS4 Permit: Tree Retention	Trees planted will require time to establish in order to show improvement over time. We recommend allowing for 3-4 years between updating cover analysis to provide meaningful data related to tree canopy cover, especially in riparian areas.	City of Bothell
MS4 Permit: PCBs	Direction will be needed for proper management of washdown water under the IDDE and O&M portions to ensure we are following appropriate BMP's.	City of Bothell
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Pavement replacement for transportation projects where they are just grinding and overlaying the surfaceshould be considered maintenance and should not trigger the new plus replaced requirements. This maintenance is needed for health and safety along roadways, and triggering new requirements when no new impervious surfaces are being added will impact the ability to provide essential life-health-safety services. Implementation of this requirement will lead to partial overlays, will reduce frequency of needed maintenance, and willsignificantly impact projects that support improved non-motorized users, transit, and vulnerable populations that are dependent on safety transportation facilities. I would not recommend including this language for maintenance activities and would instead focus on creating regional facilities for existing development to capture existing road runoff.	City of Bothell
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Many cities are trying to reduce pollution generating traffic by providing non-motorized options for commuters and the community (sidewalks, bike lanes, etc.). These projects are also focused in overburdened community areas as connectors to public transit. These surfaces should not be considered as pollution generating surfaces for consideration in transportation projects.	City of Bothell