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	There should be flexibility for specific climates, especially for Eastern Washington where few trees are naturally growing. In many cases throughout the Eastern Washington lowlands, preserving trees is inconsistent with water conservation goals and many landscapes are being converted to xeriscape which do not include trees.	City of Wenatchee
MS4 Permit: Tree Retention	There is often not enough right of way to be able to plant/maintain healthy tree canopy in the downtown corridor without causing damage to other utilities or sidewalk causing unsafe conditions for pedestrians.	City of Wenatchee
MS4 Permit: Tree Retention	The MRLC Tree Canopy Data was last updated in 2016, will this be consistently updated every three years if this is how permittees are supposed to track tree canopy data?	City of Wenatchee
MS4 Permit: Sweeping	We appreciate the language allowing communities to develop a sweeping plan related to local conditions, events, and necessity. The City is concerned about the perscibed number of sweeping events per year based on our experience 2 events is a more appropriate standard for our City. It is concerning to the City that we may be expending additional fuel resources and contributing to higher levels of tire wear particles to sweep an additional time in a year when it is not necessary.	City of Wenatchee
MS4 Permit: Sweeping	The City does not have the resources to do traffic counting. If streets have been identified as artieral/collector/residential through previous planning efforts would this be sufficient, in leiu of traffic counting?	City of Wenatchee
MS4 Permit: Sweeping	The City of Wenatchee trains staff on the proper operation of all equipment and pollution prevention; requiring additional documentation of sweeper operator training seems excessive.	City of Wenatchee
MS4 Permit: Sweeping	With regards to maintenance and operations of the sweepers, this section requires unnecessary additional doccumentation and overly regulatory monitoring of employee actions and the purchasing of additional equipment to track speed of sweepers.	City of Wenatchee
MS4 Permit: PCBs	For the education of private building owners and contractors, this section is too complicated. The City does not have the expertise to advise the public on the disposal of hazardous materials or potentially hazardous waste. Where would a business discharge wastewater from building washing that is potentially contaminated with PCBs? The City would not accept this to our sewer system without testing and if test results indicated high contamination of PCBs, what would an individual do with that water?	City of Wenatchee
MS4 Permit: PCBs	The City does not have the expertise to identify or handle PCB contaminated materials. This section seems outside the scope of the stormwater permit as it related more to hazardous waste and waste disposal.	City of Wenatchee
MS4 Permit: S8 (Eastern Phase II Only)	The City values the flexibility to complete effectiveness studies as they are currently described in the permit. These studies have proven to provide valuable results for our community which have directed current programs being implemented.	City of Wenatchee
MS4 Permit: Appendix 1 (Eastern Phase II)	In Attachment 1, Section 4. First Paragraph, the language should read consistently throughout the section, referring to projects that meet the thresholds set forth in Appendix 1.	City of Wenatchee
MS4 Permit: Appendix 1 (Eastern Phase II)	In Attachment 1, Section 5 First Paragraph, the language should read consistently throughout the section, referring to projects that meet the thresholds set forth in Appendix 1.	City of Wenatchee
MS4 Permit: Appendix 1 (Eastern Phase II)	4.7 Core Element #7, can Permittees require private parties to have a long term funding mechanism to maintain BMPs. The O&M agreement requires the property to maintain the BMP, which implies financial responsibility- it should not be the requirement for the permittee to verify or require property owners to document funding.	City of Wenatchee
SWMMEW Item 3: Stormwater Polltutants Topic	In regards to tire wear particles, it seems that this is an issue that should be worked on at the level of the tire manufactureres instead of at the end of a discharge pipe. Is the State working with the tire industries on ways to prevent pollution.	City of Wenatchee
SWMMEW Item 3: Stormwater Polltutants Topic	Is the state concerned about contaminated soils and media where bioretention and other LID BMPs have been used to collect tire wear particles?	City of Wenatchee