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<br>(select from drop down) | Comment  | Comment Made By |
|--|--|-----------------|
| MS4 Permit: Tree Retention                         | Realistic canopy cover retention/restoration objectives: the proposal mentions a few results from the SAM study for canopy cover (CC) and B-IBI. Before using these results as targets, conducting a pilot test and calculating CC using a chosen CC dataset across a few areas of interest is recommended   | Pierce County   |
| MS4 Permit: Tree Retention                         | There are various sources and methods used to identify/calculate tree canopy across an area, and can have varying results. It would be useful if these source(s) could be provided to the permittees to keep consistency with Ecology and between permittees.  | Pierce County   |
| MS4 Permit: Tree Retention                         | Jurisdiction/purview: Large scale tree capopy retention and target levels is better addressed in a land use code or forestry practices. It is already included in the Structural Source Control list. If Ecology wants to increase trees, they should increase the points for tree retention and tree canopy restoration, rather than add it as another requirement in our permit.   | Pierce County   |
| MS4 Permit: Tree Retention                         | Define the areas of interest: the proposal mentions different scales (landscape, watershed, riparian, etc). A clear definition of<br>the areas of interest would be useful in choosing the most meaningful area to calculate canopy cover. Realistic canopy cover<br>retention/restoration objectives: the proposal mentions a few results from the SAM study for canopy cover (CC) and B-IBI.<br>Before using results such as these as targets, Pierce County recommends a pilot test and calculate CC using a chosen CC<br>dataset, across a few areas of interest ("watersheds", "landscapes", etc), in areas with varying levels of development, to see if<br>CC can be reliably measured and the targets are applicable across a large and variable area. | Pierce County   |
| MS4 Permit: Tree Retention                         | A clear definition of "landscape scale" would be useful since the area of interest is an integral part to calculating canopy cover.  | Pierce County   |
| MS4 Permit: Tree Retention                         | Will Ecology provide these sources to the permittees? It would be good to use the same sources for tree canopy as some<br>sources may yield different results than others.   | Pierce County   |
| MS4 Permit: Tree Retention                         | We urge Ecology to gather more information from permittees before adding canopy retention or restoration requirements to<br>an already complex permit. Tree benefit is dependent on the species, size and location. Recommend Ecology gather<br>information on if, and how permittees organizations track tree canopy, what methods they use and then consider only high<br>value areas for regulation, if at all.   | Pierce County   |
| MS4 Permit: Tree Retention                         | Pierce County strongly recommends that tree canopy retention remain an option in the Structural Source Control program rather than a separate requirement in the permit. Adding tree planting and maintenance may be a valuable behavior change option in the Education and Outreach section of the permit, but setting canopy standards across privately owned property is not feasible or reasonable for a municipality to enforce.  | Pierce County   |
| MS4 Permit: Mapping                                | We are looking to better our database for NPDES features (outfalls, discharge points, connections, etc) and we can use this format/schema in the new database. Does Ecology plan to provide a format for the other NPDES features too? Possibly even UICs?   | Pierce County   |
| MS4 Permit: Mapping                                | What would be the process for adapting the format in the future? For example, if a particular attribute/field requires an addition, would the permittee request that change from ECY and the update be rolled out to all the permittees? Or are we free to edit the format ourselves?  | Pierce County   |
| MS4 Permit: Mapping                                | Our estimate for adopting the new format would be 1-2 years.   | Pierce County   |
| MS4 Permit: Mapping                                | We recommend that Ecology use the simplest template that is most likely used by all permitees, such as the Excel format. SRI and Shapefiles already exist and are likely to be formatted to integrate with the juridiction's own mapping needs, not Ecology's. Requiring outfalls in a specific data format will duplicate work already completed.   | Pierce County   |
| MS4 Permit: PCBs                                   | The PCB regulations are not manageable within a municipal stormwater permit. PCB regulation efforts would be better<br>designed to be similar to general outreach through joint education and outreach efforts, similar to household hazardous<br>waste, lead paint concerns, etc.   | Pierce County   |

| MS4 Permit: PCBs                                      | Pierce County is concerned about the the IDDE section of this proposed language: The County does not have a database of buildings by age. Gathering this information would require research to find the data, creating a database and map, and developing a system to track these buildings. Even after that was created, there is no permit for building washing. The only way we'd know a building was being washed would be through a complaint call and the only authority we'd have to stop the washing was if it was reaching a stormdrain conected to our MS4 or a recieving water. If washwater is not impacting the MS4 or recieving waters, this would be a toxics cleanup issue.   | Pierce County                  |
|---|---|--------------------------------|
| MS4 Permit: PCBs                                      | Ecology should create an exemption for window washing. Removal of the routine external building washdown may appear to prohibit window washing.   | Pierce County                  |
| MS4 Permit: Sweeping<br>MS4 Permit: Sweeping          | Water quality benefits of sweeping are dependent on the type of sweeper and the surrounding land use, not just ADT. As written, permittees will be forced to spend money that doesn't benefit water quality and Ecology won't see the downstream benefits they are hoping for. This language should be narrowed to streets that don't drain to treatment, are curbed, and have a high traffic volume that includes traffic signals or other traffic controls that cause frequent braking and turning and drain to a salmon bearing stream.<br>Ecology cites the consultant report as evidence for sweeping being effective at managing 6-PPD. The report suggested only that some of the ideas listed <u>could</u> be effective. More research needs to be done before implementing an expensive  | Pierce County<br>Pierce County |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | sweeping program across every permitees jurisdiction.<br>Ecology failed to provide a document showing the Appendix 1 changes within the document. We understand that a track<br>change document was messy and unreadable, however there are numerous options for crossing out, highlighting or changing<br>the font in any word processing application that Ecology could have used to provide a readable document showing the<br>proposed changes. This does not seem like a transparent and genuine effort to gather permittees input, expecially<br>considering that many coordinators workloads in the Phase II communities are such that they may not have time to compare<br>documents to determine changes./ This could lead to under representation from Phase II jurisdictions in the comments that<br>Ecology recieves.                   | Pierce County                  |
| SWMMWW Item 1: Table of Contents                      | Ecology failed to provide a document showing the SWMWW changes within the document. We understand that a track change document was messy and unreadable, however there are numerous options for crossing out, highlighting or changing the font in any word processing application that Ecology could have used to provide a readable document showing the proposed changes. This does not seem like a transparent and genuine effort to gather permittees input, expecially considering that many coordinators workloads in the Phase II communities are such that they may not have time to compare documents to determine changes./ This could lead to under representation from Phase II jurisdictions in the comments that Ecology recieves.   | Pierce County                  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | The Bioretention BMPs definition adds uneccessary complexity to existing requirements. Plants "adpated to the local climate<br>and soil moisture condition" is vague and open to individual interpretation, which could lead to conflicts during permit<br>review. The "typically sited to receive stormater runof form a small contributing area" is also vague. Is there a limit to the<br>size a bioretention should be? Is there a maximum amount of runoff that should be directed to any one bioretion system?<br>Please specify these in the language to prevent confusion. Without specifics developers will be able to justify any size<br>bioretention BMP. If the intent is to limit the size, that size should be spelled out and if exceptions are intented to be<br>permitted, the conditions for an exception should be spelled out. | Pierce County                  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Recommend removal of "movement of earth" to the land disturbing activity changes made. The phrase "movement of earth<br>or" could apply to a compost pile, or a stockyard of soil material.   | Pierce County                  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | On-site stormwater management. Requesting Ecology add the word preservation as shown: "Development, preservation and mitigation"  | Pierce County                  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | The definition for project is confusing. Recommend clarifying language.   | Pierce County                  |
| MS4 Permit: PCBs                                      | Will there be a threshold size for buildings required to meet PCB requirements? For brick buildings with window caulking will there be a deminimis exemption for buildings under a certain size or that have potential minimal PCB exposure (ie window caulking in brick buildings)   | Pierce County                  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Pavement maintenance : "The exemption MAY only be applied" followed by "the entire project MUST be" clarify whether this is a recommendation or a requirement   | Pierce County                  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Underground Utility Projects : "This exemption MAY only be applied to" clarify whether this is a recommendation or a requirement  | Pierce County                  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Underground Utility Projects: "materials with similar runoff characteristics" Clarify and provide examples.   | Pierce County                  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Bioretention BMPs definition: Bioretention facilities include a variety of plant materialIs vegetation required element for<br>Bioretention BMPs?   | Pierce County                  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Bioretention BMPs definition: Suggest to delete "typically sited to receive stormwater runoff from a small contributing area"   | Pierce County                  |

| 8   |   |                |
|---|---|----------------|
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Discharge point definition: "BMPs designed to infiltrate" What about the discharge from detention BMPs? Clarify the<br>difference from outfall  | Pierce County  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | On-site stormwater management BMPs:   | Pierce County  |
| SWMMEW Item 4: PCB Edits - Source Control BMPs        | Avoid pressure-washing areas - what would be the alternative to pressure-washing? In some cases, there may not be other options   | Pierce County  |
| SWMMWW Item 4: PCB Edits - Source Control BMPs        | "Convey washwater to a sanitary sewer after approval by the local sewer authority" seems impractical, especially for outside of a building washing.   | Pierce County  |
| SWMMWW Item 4: PCB Edits - Source Control BMPs        | Convey washwater to a sanity sewer : wastewater treatment plant is not designed to treat PCB, for effective removal, it requires significant upgrade of wastewater treatment plants   | Pierce County  |
| SWMMWW Item 4: PCB Edits - Source Control BMPs        | "Mark the wash area at gas stations, multifamily residences" Does this mean designate one area for washing (without any proper treatment) or does this mean designate the area with proper treatment/collection system installed?   | Pierce County  |
| SWMMWW Item 4: PCB Edits - Source Control BMPs        | Minimize the use of water and detergents in washing operations - specific for building washing, vehicle washing water and detergents are going to a sewer system  | Pierce County  |
| SWMMWW Item 4: PCB Edits - Source Control BMPs        | This BMPs section is confusing- It is unclear whether this is specific for general washing (mainly for oil, soaps, or detergents) or building washing for PCBs. Ecology may consider separating sections for Building washing for PCB, vehicle washing.   | Pierce County  |
| SWMMWW Item 4: PCB Edits - Source Control BMPs        | Source Control BMP and most manual requirements are required for new and redevelopment projects, which will have no<br>major PCBs-containing materials in their projects. PCB Source Control BMPs for new and redevelopment projects seems<br>inappropriate.  | Pierce County  |
| SWMMWW Item 5: Bioretention BMP                       | Are plants a required element in all Bioretention BMPs?   | Pierce County  |
| SWMMWW Item 5: Bioretention BMP                       | Typically small-scale, dispersed Clarify what "Dispersed" means here  | Pierce County  |
| SWMMWW Item 5: Bioretention BMP                       | Soil Depth 18 inches to provide "Runoff Treatment and good growing conditions" Does this mean if a project only triggers MR5, it can be shallower than 18 inches?   | Pierce County  |
| SWMMWW Item 5: Bioretention BMP                       | Suggest to allow Initial infiltration rate less than 0.3 can be used with underdrained or with orifice bioretention to meet MR5 List approach   | Pierce County  |
| SWMMEW Item 5: Bioretention BMP                       | Figure V5.28 Improve the resolution of the figure   | Pierce County  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Underground utility projects - replace the ground surface with in-kind material or materials with similar runoff characteristics<br>are only subject to 4.1 : Ecology may want to clarify this "similar runoff characteristics" section. As gravel, asphalt and<br>concrete are all considered impervious surface, and modelled the same way, resulting in the same runoff rates. As they will<br>be used for the same landuse activity, runoff quality would be similar as well. These could be used to argue that these three<br>surfaces generate "similar runoff characteristics", and "upgrading" from gravel to asphalt a replacement, not a new<br>impervious surface. | Pierce County  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Redevelopment threshold for a road related project: We support lowering the threshold for a road project to include replaced hard surfaces. Ecology may want to consider removing the second threshold - new+hard surfaces total 50% or more of the existing hard surfaces within the site. The property size should not be a factor for determining the requirements as long as it exceed the 5,000 sqft of new+replaced hardsurface. Gradual changes matter, and some of large lot may not trigger this requirement.  | Pierce County  |
| MS4 Permit: Appendix 1 (Phase I and Western Phase II) | Road-related projects - Clear definition for road related projects would be helpful. For example, commercial redevelopment site that requires road expansion work- should it follow road related project thresholds or commercial site threshold?   | Pierce County  |
|   |   |                |
|   |   |                |
|   |   |                |
|   |   |                |
|   |   |                |
|   |   |                |
|   |   |                |
|   |   |                |
|   |   |                |
|   |   |                |
|   |   |                |
|   |   | <del>ا</del> ا |
|   |   |                |
|   |   | I              |

|   | 1 |
|---|---|
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
| 1 |   |

|   | 1 |
|---|---|
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
|   |   |
| 1 |   |