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: Mapping	City of Woodinville will be using a geodatabase, therefore either Template 1 or Template 2 would be the City's recommended reporting template.	Leah Mikulsky
MS4 Permit: Tree Retention	Code related requirements will take time to coordinate internally, please allow for 1-2 years for municipal code updates. The City of Woodinville recommends flexibility if jurisdictions already have tree canopy retention policies in place.	Leah Mikulsky
MS4 Permit: Tree Retention	Please clarify the method/level of effort required for documentation of canopy cover. Is Ecology looking for general/estimate percent cover, or will land cover mapping/GIS analysis be required? This information may not be readily available to some permittees and often requires technical assistance or additional FTE or professional services/GIS	Leah Mikulsky
MS4 Permit: Tree Retention	Please clarify what the timeframe is to "document canopy change over time". Will annual evaluation be required? The City of Woodinville recommends evaluations occur at the beginning of the permit term and at the end of the permit term.	Leah Mikulsky
MS4 Permit: Sweeping	Could Ecology define or provide sweeper operator training Standard Operating Procedures which "enhance operations for water quality benefit"?	Leah Mikulsky
MS4 Permit: Sweeping	Curb miles would be difficult to track for many jurisdictions. City of Woodinville streets are currently not mapped by curb miles. City of Woodinville recommends that the requirement be changed to street or lane miles.	Leah Mikulsky
MS4 Permit: Sweeping	Ecology should consider jurisdiction biennial budget cycles when finalizing the implementation deadline for the street sweeping program. If a jurisdiction does not currently own or contract for a street sweeper it may take time to develop the budget required for this permit section.	Leah Mikulsky
MS4 Permit: Sweeping	Annual Average Daily Traffic (AADT) is not typically documented for all streets in the City of Woodinville that discharge to receiving waters that support salmonids, such as low density residential/neighborhood streets. The City recommends removing this particular documentation requirement or using a different classification such as arterial or local streets.	Leah Mikulsky