## 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
	City of Everett would prefer outfall location data utilize ArcGIS online since it would point to data and we would not have to	C': 15
MS4 Permit: Mapping	export it.	City of Everett
MS4 Permit: Mapping	City of Everett has a schema built out for our outfall and discharge points in our GIS. Based on the template provided in the	
	propsal the City would need to add additional columns (Permit Number, horizontal_coordinate_accuracy,	City of Everett
	horizontal_coordinate_collection_method).  Since our template data does not entirely match Ecology's request, can we provide extra column data that we have in our GIS	
MS4 Permit: Mapping	or does it need to match this template exactly?	City of Everett
	The City of Everett data we have is almost entirely "computer map" collection method, with no known horizontal coordinate	
MS4 Permit: Mapping	accuracy. We do not have GPS capabilities with known accuracy.	City of Everett
	The component of "Sweeper Operator Training" – What meets the definition of "trained to enhance operations for water	
MS4 Permit: Sweeping	quality benefit"? Will specific training become available or will it be something in-house created by the jurisdiction that we	City of Everett
	go over with operators as normal instruction. Provide details regarding what is needed to fullfil this?	
MS4 Permit: Sweeping	Sweeping 3 times a year and 90% of the area appear to conflict. If 3 times a year is only meant for priority areas this isn't	City of Everett
	clear.	
MS4 Permit: Sweeping	"Permittees shall annually sweep, on average, 90% of the MS4 drainage area that directly discharges to surface receiving	City of Everett
MS4 Permit: Sweeping	waters." This sentence appears to contradict the alternative frequency language.  How would the required documentation be reported? Is this just in case someone asks for the documentation?	City of Everett
M34 Permit. Sweeping	Ecology is proposing the addition of tree canopy retention on a landscape scale as another stormwater management tool to	City of Everett
	control stormwater discharges to the maximum extent practicable and improve water quality in receiving waters. The Permit	
	language should focus on MS4 discharge-related sources within the Permittee's control. The proposed tree retention	_
MS4 Permit: Tree Retention	language does not have such a Permit nexus (currently indicates receiving water regardless of MS4 source contributions to	City of Everett
	the receiving water). The required actions need to: 1) have an established tie to the permittee's MS4 ownership and	
	operational responsibilities; and 2) address the Permittee's MS4 discharge(s) impact(s) on the receiving water impairment.	
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