

**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	This update seems reasonable. We request a period of time (e.g. 6-12 months) to collect the unknown attributes that are being requested (such as elevation).	City of Spokane Valley
MS4 Permit: Mapping	Mapping format: geodatabase or shapefile.	City of Spokane Valley
MS4 Permit: Tree Retention	Ecology appears to be extrapolating the outcomes of the May 2018 study in Western Washington to cities in Eastern Washington, where the variables are dramatically different. Ecology should pursue an effectiveness study on how the proposed impacts will effect Eastern Washington before implementing new permit requirements that have unknown (and potentially unfounded) outcomes and unknown costs to implement.	City of Spokane Valley
MS4 Permit: Tree Retention	What is the measurable benefit for this requiriement? Please provide the measurable benefits to help quantify the cost-benefit of implementing this in Eastern WA.	City of Spokane Valley
MS4 Permit: Tree Retention	Tree Canopy requirements for Eastern Washignton based on a study conducted in the Pudget Sound are not appropriate. While tree canopy may be a tool that a local jurisdiciton could choose to use, the permit should not require jurisdictions to inventory and monitor tree canopy if the local agency does not plan to use this tool. The benefit of this effort is likely not justified for semi arid climates.	City of Spokane Valley
MS4 Permit: Sweeping	A minimum of three sweeps each each seems arbitrary, especially when considering that the regulated MS4 areas may not warrant three sweeps. Even if the language allows agencies to defend their proposed sweeping plan, which may mean fewer sweeps but equal benefit, it is suspected that Ecology will continue to require a minimum of three sweeps. Further, the winter season plus the size of the street network may limit an agency's ability to physcially conduct three unique sweeps that are beneficial (i.e. sweep #2 occurs immediately after sweep #1). Depending on the size of the agency, Citywide sweeps may take several months. The local jurisdiction should be able to choose the appropriate number of rounds needed based on their local knowledge of their MS4 .	City of Spokane Valley
MS4 Permit: PCBs	PCB management should be better regulated through the various waste management, demolition, disposal, hazardous material handling permits etc., similar to asbestos. This proposal seems duplicative and appears to be a result of the state's inability to manage it through the existing methods.	City of Spokane Valley
MS4 Permit: S8 (Eastern Phase II Only)	We support the option of participating in the SAM Effectiveness Study and Source Identification fund.	City of Spokane Valley
SWMMEW Item 2: Climate Change Topic	The proposed updates include recommendations or planning exercises by Ecology and/or agencies. Due to all the uncertainties associated with the topic, its vital that when/if the time comes for Ecology to implement minimum standards or requirements, that quantifiable studies are performed to determine and defend the new standards or requirements.	City of Spokane Valley
SWMMEW Item 3: Stormwater Polltutants Topic	No comment	City of Spokane Valley
SWMMEW Item 4: PCB Edits - Source Control BMPs	No comment	City of Spokane Valley
SWMMEW Item 5: Bioretention BMP	No comment	City of Spokane Valley
	The 2022 comment period is appreciated, thank you. The 2023 public hearing process will provide another opportunity for comments; however, when/how will Ecology present its revisions that are made based on the public comment? How does Ecology intend to provide responses to all of the comments recieved? It is is feared that Ecology will simply acknowledge the comments recieved, then disregard them and continue to implement whatever it chooses while ignoring the input from those practiced in actually managing stormwater systems. Please do not ignore the input provided.	City of Spokane Valley