

Thurston County's 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	The County's preferred outfall reporting options are the GIS database or shapefile templates.	Thurston County
MS4 Permit: Mapping	To protect public safety and MS4 infrastructure from harm due to actions by nefarious actors, the County encourages Ecology not to make MS4 locational information publicly available, especially at high-scale geographic resolutions.	Thurston County
MS4 Permit: Tree Retention	The <i>Tree Retention Preliminary Fact Sheet</i> explains that the proposal, in part, is based on the May 2018 SAM status & trends study tied to B-IBI stressor data. B-IBI can be a tool to help understand receiving water health status & trends for certain types of streams. Unfortunately, B-IBI data does not function effectively as a diagnostic tool (i.e., help to assess "the why" of the trends?). Teasing out the MS4 discharge signal from the various other inputs at scale is a technically challenging undertaking, requiring the proper collection of additional diagnostic data.	Thurston County
MS4 Permit: Tree Retention	The <i>Tree Retention Preliminary Fact Sheet</i> states that several accurate and available data sources exist to document tree canopy cover. This begs the question, instead of requiring permittees to document existing canopy cover and changes over time, why does Ecology not take on this task? Doing so would also provide the benefit of applying a consistent methodology to this task.	Thurston County
MS4 Permit: Tree Retention	This proposed requirement seems to venture into MS4 Permit regulatory scope creep. It can unintentionally work cross-purposes with Washington State Growth Management Act-related growth density targets, particularly given the MS4's Permit's "urbanizing areas" geographic scope.	Thurston County
MS4 Permit: Sweeping	The proposal may minimize the ability of a jurisdiction to prioritize maintenance activities.	Thurston County
MS4 Permit: Sweeping	The proposal may reduce the current level of service delivered to areas not defined as "high priority". For Phase II counties, this could result in reduced levels of services outside the MS4 Permit-regulated area.	Thurston County
MS4 Permit: Sweeping	The magnitude of the proposed program may exceed existing level of resources (e.g., equipment, staffing, decant facilities, and waste disposal costs) required for deployment.	Thurston County
MS4 Permit: PCBs	Please clarify on what constitutes "proper handling of materials" as well as "proper management of washdown water". For example, would implementing S424, S431, S438, and S451 source control BMPs as proposed in Ecology SWMMWW constitute meeting this expectation? Does "proper managing" also imply testing of the materials and associated washwater? In the event approval from the local sewer authority cannot be secured (e.g., the waste water treatment plant isn't designed to removed PCBs), what might be the alternatives disposing the washwater (e.g., TSS treatment BMPs)?	Thurston County
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Thurston County uses the WSDOT Highway Runoff Manual (HRM) for our road projects. Does Ecology's intend to require WSDOT to adopt the road-related aspects in Appendix 1 into the HRM? If so, would such HRM updates materialize in time to sync with the compliance timeline expectations of MS4 permittees?	Thurston County
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	<i>LID.04 - Downspout Infiltration Systems.</i> As of the 2019 SWMMWW, utilizing this BMP requires the soil classification by a professional (i.e., PE, Soil Scientist, Septic Designer). This generally does not pose an issue for applicants proposing a new single family residence that includes installation of a septic drainfield. However, it will affect applicants if they propose, for example, a shop when the existing home was built decades ago where the soils information cannot be found. This type of situation will most likely trigger the need to bring in a professional, resulting in additional costs to the project proponent. As an alternative, we recommend providing another pathway that allows jurisdictions to assess the soil classification in lieu of project proponent having utilize a hired professional.	Thurston County
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Please consider balancing the potential effects that threshold changes can play in effecting the ability of local jurisdictions to cost-effectively support other publicly valued infrastructure needs and priorities (e.g., fish passage enhancements, transportation, park facilities, etc.).	Thurston County
SWMMWW Item 5: Bioretention BMP	Please provide an explanation on how the acceptable pH range of the bioreterntion soils mixes were derived as this understanding will help us to respond to contractors who have been pushing back on their enforcement as to their importance.	Thurston County