

City of Sumner

MS4 Permit: Sweeping The City of Sumner currently sweeps well above and beyond the levels proposed in the permit. As proposed, we oppose the level of documentation that would be required. While AADT of busier roads has been collected in the past, being required to also collect the AADT on neighborhood streets, side streets, etc. is a large undertaking. The tracking and reporting of this permit requirement should be equal to total lane miles in MS4 and total lane miles swept.

MS4 Permit: Tree Retention City of Sumner has been a Tree City USA for over 20 years and understands the value of urban forests. The language as proposed is vague and makes unclear what the requirement is. What methods of existing canopy cover is acceptable (random samples like iTree canopy, GIS aerial surveys, etc.). How often is documentation supposed to occur? Improving tree canopy takes time and results implemented from the permit requirement likely wouldn't be realized for several permit cycles.