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: PCBs	For Education and Outreach the target audience is described as engineers, contractors, developers and land use planners - wouldn't these audiences only be involved with demolistion of buildings with potential PCBs. Shouldn't the target audiences be property owners or managers of a certain age of building who are likely to be maintaining, cleaning and remodeling?	
MS4 Permit: PCBs	Section B. e. Seems challenging to message and implement. It is hard enough if not impossible to catch people in the act of power washing homes since they are not applying for permits to do so, then having to check when they were constructed and have them put together a pollution prevention plan, when likely we have only come across the activity once it is partially or mostly complete and the damage is done.	
MS4 Permit: PCBs	Section C xvi. This isn't an operations and maintenance activity, this is capital improvement of buildings.	
MS4 Permit: Sweeping	The City uses a contracted sweeper for street sweeping services - we typically do not obtain information on on the street waste volume removed and this may not be accurate as they are allowed to sweep other customers they contract with prior to dumping.	
MS4 Permit: Sweeping	Most leaf fall has not occurred prior to October 1. I would encourage shifting date until later.	
MS4 Permit: Sweeping	The City uses a contracted sweeper for street sweeping services - we would need documentation on what Ecology considers the proper design speed and how that is to be verified along with maintenance requirements to provide to them	
MS4 Permit: Sweeping	The City uses a contracted sweeper for street sweeping services - how are we expected to provide training for a contractor or will there be a certification course you can provide to them?	
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Can you provide a definition for "changing a charecteristic of a roadway"	