Informal Comments on the PRELIMINARY DRAFT Municipal Stormwater Permits (Western Phase II) and Stormwater Management Manuals (Eastern and Western) October 17 - December 2, 2022

Commenter	PRELIMINARY DRAFT TOPIC	Comment
City of Redmond	Tree retention – stormwater planning or monitoring & assessment	Permit calls for documenting "canopy change over time." Questions related to associated annual reporting: What is time period? Will this be part of each year's annual report? Will Ecology set the parameters for riparian buffer width reporting or leave to Permittee? Which class streams? What will annual report submittal look like?
City of Redmond	PCBs – Education and outreach, IDDE, O&M	Phase II SS.C.2.a.ii(b): new subject area language is vague—is the focus on PCbs that would be released during demolition/renovation? If is related to PCBs is standing buildings, this is the wrong audience.
City of Redmond	PCBs – Education and outreach, IDDE, O&M	Phase II SS.C.S.c.ii(d) and (e): Please provide a date by which municipal code must be updated to reflect these changes. It can take more than 12 months (often 24 months) to update municipal code.
City of Redmond	PCBs – Education and outreach, IDDE, O&M	Phase II SS.C.5.c.ii(e): what is meant by pollution prevention plan guidance? May be helpful to refer to Table 3 of the Ecology guidance (if only in Fact Sheet)
City of Redmond	Street sweeping	Footnote 1: Confusing on a few fronts. (1) Outfall, by definition, is to surface waters so can end sentence at "that have an outfall." Second sentence of footnote seems to suggest that areas with flow control or treatment may not need street sweeping? This seems to muddy definition of "high priority areas"
City of Redmond	Street sweeping	New section: Annual report documentation seems overly complex. For example, City does not have current data on AADT for all roads that are swept integrated into GIS. Perhaps better to require a map that shows high priority areas as an attachment, confirmation that all high priority areas swept at least 3 times, and total vol of of street waste volume removed (citywide).
City of Redmond	Street sweeping	New section: Add clarifying language to third bullet "Permittees shall annually sweep, on average, 90% of high priority areas within the MS4 drainage area that directly discharges to surface receiving waters"
City of Redmond	Street sweeping	New section: "Permittee shall follow equipment design performance specifications to ensure that street sweeping equipment is operated at the proper design speed with appropriate verification, and that it is properly maintained." What does "appropriate verification" involve?

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nase II: Tree retention – stormwater planning or monitoring & assessment nase II: PCBs – Education and outreach, IDDE, O&M

nase II: Sweeping – O&M

nase II: Controlling runoff – Appendix 1 (EWA and WWA updates)

VMM: Table of Contents

WMM: Climate Change Impacts on Stormwater Management

VMM: Stormwater Pollutants and Their Adverse Impacts

VMM: PCB updates in Source Control BMPs (S424, S431, S438, and S451)

VMM: Bioretention BMP (including HPBSM updates)

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