

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: Sweeping	Please clarify whether the 90% performance metric will apply to "the MS4 drainage area that directly discharges to surface receiving waters" OR to "high priority areas" which have a more restrictive definition.	
MS4 Permit: Sweeping	The City's current street sweeping program is performed with contracted services. Please confirm that the responsibility of following equipment design performance specifications, maintenance, waste disposal, and training can be satisfied through contractual language.	
MS4 Permit: Sweeping	Lane miles would be a more accurate measurement for sweeping activities than "curb miles".	
MS4 Permit: Sweeping	The City was awarded a grant for an Enhanced Maintenance Plan and street sweeper purchase. This work is planned for 2023 with purchase of a sweeper in 2024. The City anticipates this effort will combine with contracted service to continue providing regular sweeping and help us address this new permit requirement.	
MS4 Permit: Tree Retention	<p>Sammamish has been managing for tree canopy and healthy urban forest coverage for several years. This work has involved dedicated staff FTE, contracted professional services, and grants from various sources to advance the work. Tree canopy has been assessed twice- 2018 (City-wide) and 2021 (Street Trees and some Park Trees), this work cost \$60,000 and \$76,120 of which the latter was grant funded. While it has become more common to update aerial imagery frequently in our area, the review of this imagery to understand tree canopy coverage requires contracting with professional service providers. Additionally, the tree canopy assessment was part of a larger planning effort, the development and adoption of the Urban Forest Management Plan which started in 2016 and was adopted in 2019. An Implementation Strategic Plan was adopted shortly thereafter in 2021. The UFMP is not due to be updated until 2029 and at which time the City will review and update its Tree Canopy Assessment.</p> <p>The City's work can be viewed here: <a href="https://www.sammamish.us/government/departments/community-development/planning/urban-forest-management-plan/">https://www.sammamish.us/government/departments/community-development/planning/urban-forest-management-plan/</a>.</p>	
MS4 Permit: Tree Retention	Trees may be defined differently across jurisdictions, would Ecology accept these potential variances?	
MS4 Permit: Tree Retention	Please clarify whether "landscape canopy cover" would include understory, would general tree cover be included as part of riparian cover?	
MS4 Permit: Tree Retention	The City currently has tree code that addresses removal, retention, and replacement. See here: <a href="https://online.flippingbook.com/view/635351213/167/">https://online.flippingbook.com/view/635351213/167/</a> . Will the City be asked to track and submit data on permitting of tree removals and replacement?	
MS4 Permit: Tree Retention	What format would this data need to be submitted?	
MS4 Permit: Tree Retention	Please clarify whether tree canopy would be required to be assessed city-wide, within rights-of-way, and/or on publicly owned lands.	
MS4 Permit: Tree Retention	Would submittal require aerial imagery? We suggest a regional approach to perform and fund aerial imagery may be advantageous.	
MS4 Permit: PCBs	Adding PCBs to the IDDE section of the permit seems to imply the City would be held responsible for PCBs in the MS4. Please clarify the intent and limitations on how this requirement would be applied to the City's responsibilities for the potential release of PCBs.	
SWMMWW Item 2: Climate Change Topic	The manual continues to promote stormwater ponds over enclosed systems for detention. The concern raised is a 1.3° temperature increase, re-evaluating this approach may be warranted.	
SWMMWW Item 3: Stormwater Pollutants Topic	Need content for the pollutants from tires as there is little time left to make any comments for pending new data in this proposed manual before it is going to go to publication. Example of an item that may be already addressed is source control by removing the problem in the first place via change in tire allowances. Obviously this would need to address the tire industry which is moving ahead with using the anti-oxidant without having to mitigate for it, while essentially causing ubiquitous hazard to salmonids.	
SWMMWW Item 3: Stormwater Pollutants Topic	The short discussion about PAHs is reminiscent of the concern raised in the Marine Corps base in North Carolina. It is unclear whether the manual follows the same requirements done in cleanup efforts in Camp Lejeune of polyaromatic hydrocarbons. This is more of concern at industrial and maintenance facilities than along roadways, at private homes, typical businesses and schools.	

SWMMWW Item 5: Bioretention BMP	The statement at the beginning of BMP T7.30 is that Ecology recognizes that bioretention can meet the requirements of MR5 through MR8. The updates that will be expected by phase 1 and phase 2 MS4s should follow this so that is recognized in a way that matches how Ecology accepts the system to be applicable for these. Some only currently allow it for MR5 purposes.	
SWMMWW Item 5: Bioretention BMP	Regarding infeasibility criteria: On page 44 of 125 of the draft package for SWMMWW it is identified that placement of bioretention is allowed up to 10 feet from a small on-site sewage system. This is something that is regulated by the local department of health, so that may be less of a distance than is allowed at specific localities.	
SWMMWW Item 5: Bioretention BMP	Regarding infeasibility criteria: On pages 45 and 46 of 125 of the draft package for SWMMWW it is identified that the local jurisdiction can designate areas as infeasible for bioretention. Is this something that Ecology will be monitoring, or is that decision up to each jurisdiction whether to pursue and if so, how to do this? If left to local jurisdictions there could be such a variation that it ends up not being uniformly evaluated within the region based on similar parameters.	
SWMMWW Item 5: Bioretention BMP	The three options of HPBSM is interesting. As detailed in Type 3, it is best for making sure plantings have more success relative to Types 1 and 2. Will the first two types still meet the noted performance goals if plantings don't take root in those systems?	
SWMMWW Item 2: Climate Change Topic	The proposed use of WWHM given two pending options is to use the future rainfall data if available at that location and resort to the data from the 1940s through 2009 if the future option is not available. Is there going to be a verification method during the five years of the manual's applicability to verify that the future model actually matches up with those 5 years? Otherwise, would it be possible to revert back to the known data even when there is a future option if that option doesn't actually match up with reality?	