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: Mapping	Based on Ecology's definition of an "outfall" in the Definitions and Acronyms (Glossary) section of the current EWA Phase II Municipal Stormwater (MS4) 2019-2024 Permit, is a point source as defined by 40 CFR 122.2. According to Title 40, Chapter I, Subchapter D, Part 122.2 of the Code of Federal Regulations (CFR), the definition or term of a "point source" does not include return flows from irrigated agriculture or agricultural storm water runoff. Sunnyside Valley Irrigation District's drainage system; such as those artifically constructed drains (DRs), joint drains (JDs), and wasteways (WWs); within its geographic area of MS4 coverage since 2007 and long prior to Ecology's first issuance of the Municipal Stormwater general permits in the State of Washington are solely designed and intended for conveying agricultural return flow to the Lower Yakima River (WRIA 37).	Sunnyside Valley Irrigation District (SVID)
MS4 Permit: Tree Retention	For many permittees there are many sections or locations of a MS4 system, or surface/subsurface drainage ditches in general that currently are or are in the future process of becoming enclosed. Has Ecology considered the beneficial impacts not only on improving water quality but water conservation when artifically constructed waterway(s) go from an open surface ditch to an enclosed pipe system vs. maintaining or planting vegetation along the waterway(s)? It may be more practical and efficient to remove potential point or nonpoint sources, whether it is pollutants from the soil, air, and/or an illicit connection or discharge, from the surrounding environment along the constructed waterway(s) rather than left open and exposed.	Sunnyside Valley Irrigation District (SVID)
MS4 Permit: Tree Retention	Although tree canopy or riparian buffers along a waterway(s) can provide good protection against impairment and filtration of pollutants to improve water quality, trees and/or other plant vegetation along an artifically constructed waterway can cause some problems as well. The large and extensive root systems can aggressively spread and become overgrown along the constructed waterway(s) which then create hazard working conditions for when O&M activities need to be perform to stabilize the bank(s) due to various flows throughout each water season (irrigation and non-irrigation). The trees / other plant vegetation and their root systems can also block or impede flows which could cause the water to overtop or a break to occur leading to flood event(s).	Sunnyside Valley Irrigation District (SVID)

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