Formal Comments on the DRAFT Municipal Stormwater Permits (Phase I, Eastern and Western Phase II) and Stormwater Management Manuals (Eastern and Western) August 16 - November 10, 2023

Comment Categories For each row/comment, select the category form the dop downs below that the comment applies to. Please only select one category per comment. (e.g. for a comment on bioretention design guidance in Easern Washington, you would select "Chapter 6" from the "SWIMMEW" Column, and the other columns would be left blank for that row).						
Phase I MS4 Permit	Phase II MS4 Permit - WWA	Phase II MS4 Permit - EWA	SWMMWW	SWMMEW	Comment	Comment Made By
			Volume I		Can you charly what improvements in the following example would continue to qualify for a utility exemption? Consider a water main replacement project that replaced 4.000 lineal feet of water main which traverses through PGHS, landscape, and natural areas. In all cases, other than noted below, several acres of trench restoration are replaced with in-kind materials and there is no change to the drainage patterns. As part of the project, a 10 foot by 10 foot area is converted from landscape to concrete as a foundation for a booster pump that is added to the line to bring the water main up to current standards. The booster pump is part of the underground utility system, but happens be above ground. Is the intent to have this entire project be evaluated as a replaced surface since 100 s of al landscape area is converted to a concrete stall on ? Converting landscape to concrete should be evaluated against the thresholds for the areas that are converted, but the entire trenching for the project that replaces materiais in-kind should not be included in the threshold evaluation. There is no net impact with regard to pollution or flow control for replacing of in-kind surfacing for the purpose of underground utility placement. It appears that this exemption was put in place to allow for utility projects of this nature. I see that the change is a regulaced surface and that was not what Ecology intend. However, if the exemption does not allow for typically modernization upgrades by utility providers to their facilities, then there will be no instances where exemptions are allowed witch also does not seem like Ecology is intent. If this change to the exemption means that projects of this type must meet MR1-9 for all the surfacing traits replaced as part of the trenching, this will result in huge added costs to the utility. If whice hange to he advect boards by utility purveyor. Further, if the utility purveyor does not own the readway being replaced, they would be forced to upgrade the existing readway for treatmen	Rhett Winter, PE. of Wilson En
			Volume V		The design procedure for BMP T5.12 Sheet Flow Dispersion states "Ensure that the dispersion area is sufficient to dispose of runoff through infiltration" Is "Ensure" the intended word? Often dispersion is used where infiltration was evaluated to be infeasible. "Ensure" seems to imply that there is some modeling that is required rather than just following the prescriptive options presented further below.	Rhett Winter, PE. of Wilson En
			Volume V		Does Ecology see and advantage of using the HPBSM #1 over the Default BSM for installations that do not require phosphorus treatment? If so, please explain. If not, is there any instance when using HPB5M #1 makes sense considering it is likely more costly than the Default BSM? If there is an advantage, couldn't HPBSM #1 be used with compost in areas where phosphorus treatment is not required?	Rhett Winter, PE. of Wilson En
			Volume V		It seems that the only difference in HPB5M #2 and #3 is that #3 is more successful at retaining plants. Is #3 more successful because the compost helps with moisture retention or that it provides more available nutrients? If plants are part of successful bioretention installations, then why is HPB5M #2 an option? If the compost only helps with moisture retention, maybe similar results can be obtained with HPB5M #2 by providing supplemental irrigation.	Rhett Winter, PE. of Wilson En
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Using this Template

To Use This Spreadsheet:

Stormwater Permits (Phase I, Eastern and Western Phase II) and Stormwater Management Manuals (Eastern and Western).

For each comment you have, fill out a separate row in the spreadsheet. Enter the permit/SWMM category (from the drop down menu), then type your comment in the cell under the "Comment" header. The last column ("Comment Made By") is optional, but will assist Ecology if follow up on your comment is needed.

To Return This Spreadsheet To Ecology:

The preferred method of returning comments to Ecology is by <u>submitting the .xlsx file to</u>: <u>https://wq.ecology.commentinput.com/?id=C57pYMegb</u>