

City of Tacoma

See file attached (City of Tacoma Draft Permit Mod Comments - August 2021) for comments from the City of Tacoma.

The City of Tacoma is concerned that the language as written in the permit modification could pose implementation issues for the City of Tacoma. The language of concern is “The City of Tacoma’s Stormwater Program is only approved for use within the City of Tacoma’s city limits.”

The vast majority of the City of Tacoma SWMM is applicable to projects located outside of City limits. The permit modification language as proposed by Ecology:

- Could pose implementation issues for City facilities located outside the City of Tacoma that might use operational source control BMPs.
- Could pose implementation issues for projects outside of the City that may request to connect to the City of Tacoma system.
- Gives the appearance that the City of Tacoma SWMM is not as acceptable or legitimate as other Phase I manuals.

Tacoma requests that Ecology either:

- 1) provides written justification or clarification within the Permit Modification for the following language included in the draft Permit Modification. “The City of Tacoma’s Stormwater Program is only approved for use within the City of Tacoma’s city limits.”

or

- 2) updates the permit Modification language as follows:

Below the City of Tacoma suggests updates to the proposed ECY Permit Modification Language. Proposed language is shown as text edited in colored text. The City recommends that Ecology adopt language edits as provided below.

“C. City of Tacoma

City of Tacoma is meeting permit requirements S5.C.5.b.i and S5.C.5.b.ii, and achieves equivalency with Ecology’s 2019 Stormwater Management Manual for Western Washington by adopting and implementing the regulations and rules listed below.

Other jurisdictions considering adopting the City of Tacoma Stormwater Management Manual July 2021 Edition must update certain language as described in Tables 10.1 and Tables 10.2.

- Per Table 10.1 – Item #87 and Table 10.2: Item #917: Any references to Flow Control Exempt Waterbodies in relation to the Puyallup River shall provide the upstream point/reach for exemption as provided in the SWMMWW – Appendix I-A: Flow Control Exempt Receiving Waters.
- Per Table 10.1 – Item #8: Minimum Requirement #5 must be updated to include guidance for areas outside the UGA as applicable.
- Per Table 10.2 – Item #89, #490: Any references to Basic Treatment Receiving Waterbodies in relation to the Puyallup River shall provide the Downstream of

this Location provided in the SWMMWW – Appendix III-A: Basic Treatment Receiving Waters.

- Per Table 10.2 – Item #557: Guidance for Full Dispersion must be updated to include guidance for areas outside the UGA as applicable.
- Per Table 10.2 – Item #710: For biofiltration swale design, the K value appropriate for the individual jurisdiction must be used.

Other jurisdictions considering adopting the City of Tacoma Stormwater Management Manual July 2021 Edition must also ensure that any pre-sized BMP tables are updated or verified to ensure appropriate sizing for runoff files specific to a given jurisdiction.

~~These regulations and rules are only deemed functionally equivalent within the City of Tacoma limits.~~

1. Tacoma municipal code Chapters 12.08A “General Administration” and 12.08D “Stormwater Management”, effective July 1, 2021 (Ordinance No. 28761)
2. The City of Tacoma Stormwater Management Manual July 2021 Edition, effective July 1, 2021 (Ordinance No. 28763).”