

Document	Section	Page	Comment	Rationale/Justification
Municipal Stormwater Phase I Permit	S6.A	31	<p>Add new bullet point S6.A.6</p> <p>"No later than 12 months from the effective date of the Primary Permittees' stormwater code and manual or SWMMWW, each Secondary Permittee shall adopt and make effective local policies, procedures and manuals to be as protective, or more protective, than those specified in the SWMMWW or relevant stormwater ordinances, rules, and regulations of the local jurisdiction(s) in which the Secondary Permittee is located."</p>	<p>Similar to the time allowed to primary permittees to update their stormwater programs, manuals, and codes, secondary permittees need time to conduct a thorough review of their stormwater program to ensure compliance with local rules and regulations.</p>
Municipal Stormwater Phase I Permit	S6.E.6.a.ii	41	<p>Edit S.E.6.a.ii</p> <p>"The operation and maintenance manual shall establish facility-specific maintenance standards that are as protective, or more protective than those specified in the Stormwater Management Manual for Western Washington <u>relevant ordinances, rules, and regulations of the local jurisdiction(s) in which the Permittee is located.</u>"</p>	<p>Consistency and ease of implementation when secondary permittees are required to comply with one stormwater manual and code. Sections S.6.E.3 Illicit Discharge Detection and Elimination, S.6.E.4 Construction Site Stormwater Runoff Control, S.6.E.5 Post-Construction Stormwater Management for New Development and Redevelopment all require compliance with "all relevant ordinances, rules, and regulations of the local jurisdiction(s) in which the Permittee is located." Both City of Seattle and City of Tacoma have equivalent stormwater manuals to SWMMWW.</p>