

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: Tree Retention	The current preliminary draft permit language appears to be incomplete and lack significant implementation detail. It is difficult to provide comments at this state. Additional comments for these sections should be allowed once the language is further developed.	City of Tacoma
MS4 Permit: Tree Retention	The preliminary draft permit language states "there are several sources of accurate and available data sources to document tree canopy." Will Ecology be creating guidance for jurisdictions on how to find and utilize these sources? Will there be trainings provided on how to model land cover change, especially tree canopy, using this open source data? Local staff are not necessarily aware of the data Ecology appears to be referencing and/or have the ability to utilize the resources.	City of Tacoma
MS4 Permit: Tree Retention	The preliminary draft permit language states that permittees shall document canopy change over time. Is this a one-time action, or will there be expectations for how often to reassess canopy cover change? Will individual actions need to be tracked (such as tree removals and plantings through development/permitting) or will a gross assessment suffice (tree canopy analysis)?	City of Tacoma
MS4 Permit: Tree Retention	The preliminary draft permit language states: "Permittees shall adopt and implement tree canopy retention/restoration objectives in order to support stormwater management and water quality improvement in receiving waters". Are there examples of qualifying tree canopy retention/restoration objectives? Can it be as broad as an Urban Forest Management Plan, or does it need to be as specific as municipal code related to development standards?	City of Tacoma
MS4 Permit: Tree Retention	Will tree canopy only be important where B-IBI is a measurement?	City of Tacoma
MS4 Permit: Tree Retention	What if B-IBI is not an appropriate measure in a particular watershed?	City of Tacoma
MS4 Permit: Tree Retention	What does restoration mean/how is it defined? - is it conversion of impervious to pervious and vegetated? is it developed to undeveloped? A lot of the restoration undertaken by local municipalities is enhancement of existing forested areas by adding evergreens. If the desired coverage is 59% - The City only has control over the properties that we own. Does this mean the City should own more? What if 59% is not achievable with the properties that are currently undeveloped within a Permittees Permit coverage area?	City of Tacoma
MS4 Permit: Tree Retention	The preliminary draft permit language includes the phrase "to support stormwater management and water quality improvement in receiving waters." Is Ecology proposing to quantify "water quality improvement in receiving waters"?	City of Tacoma
MS4 Permit: Mapping	Ecology should make the templates very clear which fields are required and which are optional. Permit managers often convey information to GIS staff and clarity is needed in order to reduce any confusion.	City of Tacoma
MS4 Permit: PCBs	There is some question from the preliminary draft permit sections regarding EPA's role and Permittee obligations to EPA regarding PCBs that may be discovered. Please clarify as some Permittees may not have experience with PCBs and there obligations.	City of Tacoma
MS4 Permit: PCBs	The preliminary draft permit language for Section e. Paragraph 2. The actions required to ensure that this washwater is conditionally allowable is not clear. The paragraph refers to "following pollution prevention plan guidance". Is the pollution prevention plan guidance available for review? Will it be a part of the permit? Is this a site specific pollution prevention plan or a programmatic pollution prevention plan?	City of Tacoma
MS4 Permit: Sweeping	In general, the request of the Preliminary draft permit language is a very large effort by municipalities and will require the generation of data that is not funded or currently available. Ecology should have focused discussions with Permittees regarding this section and the costs associated with supplying the information requested. It is not clear how Ecology will use some of the information requested, it needs to be clear and related to Permit goals before permittees are required to expend such a large outlay of money and resources. The major concern is the request for AADT of all roads swept and the "map" of sweeping routes. These items are not directly related to water quality but will require large outlays of time, staff and monetary resources to supply. Ecology should remove requests for these items. See specific comments below.	City of Tacoma

MS4 Permit: Sweeping	On Page 2 of the Street Sweeping Requirements document it is stated, "If a permittee's street sweeping efforts provide equivalent or greater street sweeping frequency relative to the requirements, the permittee may continue to implement its existing program." Similar language is noted on Page 2 of the document bullet 2, sub-bullet 2. Please clarify how this judgement is to be made. Will any type of submittal to Ecology be required?	City of Tacoma
MS4 Permit: Sweeping	The phrase "reasonably expected to result in maximum water quality benefit to receiving waters" is aspirational, vague and qualitative. Please rephrase, recommended language is "reasonably expected to limit pollutant transport into receiving waters"	City of Tacoma
MS4 Permit: Sweeping	Please define high AADT in the context of this permit section	City of Tacoma
MS4 Permit: Sweeping	Please clarify how Ecology expects Permittees to determine AADT of roads swept.	City of Tacoma
MS4 Permit: Sweeping	The City of Tacoma does not have AADT counts for all roads or even the majority of roads within the City. It would be both time, resource and staff intensive to have to provide this information for all roads swept. What will Ecology do with this information? Is it directly related to the Permit goals? This high cost requirement does not seem to be the best use of funding to improve water quality.	City of Tacoma
MS4 Permit: Sweeping	The preliminary draft language requests a map of the routes swept. Based on the bulleted requirements of where a Permittee would be required to apply sweeping, this would be nearly the entire City. Can this requirement be fulfilled by supplying a map of Tacoma with streets shown? Tacoma does have the "map" of roads swept. However, the map is not something that anyone can look at and readily understand. With 4 sweepers running daily, the "map" appears as a lot of lines that overlap or are very near each other.	City of Tacoma
MS4 Permit: Sweeping	Please define "accessible curb and gutter". Is this referring to concrete curb and gutter or asphalt wedge curb or both? Ecology should understand that Tacoma does not have a up to date comprehensive inventory of which streets have curb and gutter and creating that inventory will take a large time and money effort. Ecology should discuss this with Permittees and create requirements that do not require inventories of streets with curb and gutter.	City of Tacoma
MS4 Permit: Sweeping	Paragraph 2, bullet 1, sub-bullet 3 states "Areas identified with significant traffic and turning, e.g. Municipal parking lots, roundabouts, high AADT intersections." 1) Please define significant traffic and turning. 2) It appears that this requirement is extending beyond Permittee Right-of-way and onto Permittee owned parking lots, please clarify. 3) Why are municipal parking lots considered high priority? These would typically see much less traffic and parking turnover during the day than a commercial type parking area. 4) Why are roundabouts listed, please provide a definition of roundabouts. The majority of "roundabouts" in Tacoma may be better characterized as traffic circles used in low to medium traffic streets for traffic calming.	City of Tacoma
MS4 Permit: Sweeping	Why are all streets with curb and gutter assumed to be high priority areas, where is the data to support that?	City of Tacoma
MS4 Permit: Sweeping	Paragraph 2, bullet 1, sub-bullet 4 clarify what this means. Does this mean Right of way within commercial and industrial areas or is intended to extend on to parcels. Extension onto parcels is problematic for Permittee implementation.	City of Tacoma
MS4 Permit: Sweeping	Paragraph 2, bullet 1, sub-bullet 5, please provide a more concise definition for this bullet. Nearly every MS4 basin discharges into Puget Sound which could be construed as a surface receiving water that support salmonids. This would be nearly the entirety of all Permittee's MS4s. Is that Ecology's intent?	City of Tacoma
MS4 Permit: Sweeping	Paragraph 2 bullet 3 states, "Permittees shall annually sweep, on average, 90% of the MS4 drainage area that directly discharges to surface receiving waters." Is this in addition to the requirements of bullet 1? This would include streets without curbs, is that Ecology's intent? Or was this statement intended to be a compliance metric for bullet 1? Please clarify. If this statement is the compliance metric, please state that directly.	City of Tacoma
MS4 Permit: Sweeping	Page 2 of the Street Sweeping Requirements fourth bullet indicates months where it appears Ecology would require sweeping to happen. 1) It does not appear that similar "month" requirements are within the permit section language. Please clarify if the months to sweep will be prescribed by Ecology. 2) If the months are prescribed, Tacoma would not have the resources needed to continue our current program of emphasizing (more) sweeping within our high traffic and pollutant loading areas and would instead need to transfer effort to residential streets that are likley to contain overall less pollutants. Ecology should engage Permittees in focus sessions to discuss current programs and how they could be improved.	City of Tacoma

MS4 Permit: Appendix 1 (Phase I and Western Phase II)	It is requested that Ecology provide a marked up version in order to more easily compare the proposed changes of the Permit and SWMM to the existing language. Ecology required similar documentation for their review of Permittee Stormwater Management Manuals - it is only appropriate that Ecology would provide a similar easy way to review the new proposed documents.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Provide the data that substantiates the new thresholds for road related redevelopment projects. The change from new hard surfaces adding 50% or more to the existing hard surfaces within the Site to new and replaced hard surfaces is a substantial change and seems somewhat arbitrary. For example, a 10,000 square foot project would only need 1750 square feet of new hard surface area for the project to require looking at MR#1-9 (because a project already has 35% hard surface coverage to be considered a redevelopment project) which could discourage redevelopment projects.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Provide the data that substantiates the new 2,000 square foot threshold per TDA.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under pavement maintenance - resurfacing with in-kind material without expanding the road prism was removed. Please describe why this was removed.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Reshaping/regrading drainage systems and vegetation maintenance do not seem appropriate under pavement maintenance. Consider revising the category of minor land disturbing activities or similar to cover these scenarios more appropriately. The definition of land disturbing activities includes vegetation maintenance and stormwater facility maintenance as not being land disturbing activities.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Define resurfacing.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Define base course.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Define bituminous surface treatment and chip seal.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Pervious pavement was not included under maintenance practices. Would upgrading from gravel to pervious pavement be considered a replaced or new hard surface? Consider removing: "Resurfacing by" from the third bullet to avoid confusion with the resurfacing that is exempt from the Minimum Requirements (MRs).	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Consider moving the definition of preservation or maintenance practices from under the pavement maintenance projects section to the definitions section.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under Underground Utility Projects include the construction of utilities - as written it appears that only maintenance and upgrade work would be considered as exempt.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under Underground Utility Projects it is unclear why it is necessary to prepare a Stormwater Site Plan if the project is not subject to the Minimum Requirements.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Define underground utility projects.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Include above ground utility projects in this exemption.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Consider moving Section 2 (Definitions) to the end of the Appendix to be more consistent with the permit body and general practices that put definitions at the end of a document.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Suggest adding language at the top of this section that clearly states that the types of projects below are only exempt if the entire project is that project - currently language to that effect is only proposed to be included in the Pavement Maintenance and Underground Utility Sections.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Additional language was added to the definition of bioretention that appears to state that bioretention facilities are only appropriate for small contributing areas. Is this the intent? This would limit the use for LID facilities such as bioretention in the SSC program. Additionally, small contributing areas is not defined.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	The term MS4 facilities/BMPs is used in the definition of discharge point. Define MS4 facilities/BMPs or used the term "stormwater treatment and flow control BMPs/Facilities" or "stormwater facilities regulated by the permittee" or another defined term.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Define lawn or landscaped areas.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	For the definition of Land disturbing activity: Define soil cover.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	The definition of Low Impact Development Best Management Practices includes a fairly exhaustive list of LID BMPs but at the same time leaves out items like drywells and infiltration trenches. It is recommended to include all BMPs within the SWMMWW considered to be LID or remove the list completely from the definition.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under the definition of new impervious surface an dirt is used as an example of a pervious surface. The definition of impervious surface provides that "packed earthen material" is an impervious surface. Provide a definition for dirt.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	For the definition of new impervious surfaces, consider adding buildings and structures to the narrative. For example: upgrading from gravel to asphalt, concrete or roofs. (Typ. For all three bullets)	City of Tacoma

MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under the definition of project - how is it determined when a Permit application requires drainage review? Provide parameters to this additional language.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under the definition of redevelopment remove the parenthesis and make it clear the cut-off between new development and redevelopment is 35% existing hard surface coverage). As written, it's sort of an example of what substantially developed might mean.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	For the definition of Redevelopment: The definition of redevelopment is specific to sites. It is unclear how this definition would apply to projects that have work both on parcels and within the ROW.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under the definition of replaced hard surface make it more clear that the structure replacement does not only include replacement with another structure. Removal of a structure and subsequent resurfacing where a structure once was would also be considered a replaced hard surface. Suggest removing: "for structures" and "for other hard surfaces" to more fully encompass intent.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Remove the definition of vehicular use from the definition of pollution-generating impervious surfaces. The term is defined later in the Appendix. Inclusion here can create confusion.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under the definition of pollution-generating impervious surface (PGIS) - restaurants where oil and other solid particles are expected to be expelled was added to the definition. What type of treatment is appropriate for roof venting of oils/grease? The treatment type seems more appropriately tied to building codes than the stormwater codes.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	For the definition of Site: Define road projects. The definition of site does not appropriately cover the scenario where road work is completed as part of onsite work (for example, a business is required to replace a road as part of building a new building).	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	For the definition of Threshold Discharge Area: In the urban environment, natural discharge locations no longer exist. It is recommended to remove TDA designations for the urban environment or define them differently in the urban environment - for example, they could be based upon current topography and conveyance system outfalls.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	For the definition of Vehicular Use: further define "Infrequently used"; additionally consider changing the term and definition to "regular vehicular use".	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Add the following definitions: new hard surface area, vegetation, pasture, development project, subdivision, plat, short plat, building permit, or other construction permit as they are used in the within this Appendix including within the Minimum Requirement language.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under Section 3.1 - define common plan of development or sale.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	The question about UIC well discharges in Figures 3 and 4 may be more appropriate in Figure 2 because that runoff will not be going to the MS4.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	The use of new development, new development projects, redevelopment, redevelopment projects, project, project site, and site is often confused when determining which Minimum Requirements apply. For example, a project is the proposed action to alter or develop a site. A site is defined by the legal boundaries of a parcel or parcels of land subject to the new development or redevelopment. A project thus would never combine onsite (individual parcel) work with work that would happen in the Right of Way (utility work, sidewalks, etc. that might be required as part of the project). It is suggested to really take a look at each instance of the terms within the Permit and SWMM to ensure MRs are applied as ECY intends. As written, Minimum Requirements could be applied differently for each jurisdiction. Another example, if the language in Section 4: "This Section describes the Minimum Requirements for stormwater management at new development and redevelopment sites." This language would limit the requirements to legal boundaries of parcels only.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Throughout the document, ensure that "new development" states "new development" and not just "new or redevelopment projects" because there is no definition for new projects. The correct terminology should be "new development or redevelopment projects."	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under Sections 3.2 and 3.3, it is unclear if All Minimum Requirements apply to the converted vegetation areas if the converted areas do not meet the thresholds as outlined in the flow chart. Add additional language to both the chart and the project thresholds sections for clarity.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 3.3: It is stated that the Minimum Requirements can be met for an equivalent area. Does this section only apply to redevelopment projects?	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under Section 3 - why was the following language removed: "The Permittee may grant a variance/exception to the application of Minimum Requirement #7 to replaced impervious surfaces if such application imposes a severe and economic hardship."	City of Tacoma

MS4 Permit: Appendix 1 (Phase I and Western Phase II)	As related to the redevelopment thresholds define the following terms: commercial projects, industrial projects, commercial sites, and industrial sites.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 3.4: Why are only redevelopment project limited to being able to meet their obligations through the use of a regional facility? The water quality impacts are similar. Consider revising to allow the use of regional facilities for all types of development.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.2 - The second paragraph under General Requirements - it is unclear what this section is requiring. Is this section specific to platting? Define developments, define site development plan.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.2 - The seasonal work limitations are a confusing section because the items that apply to the seasonal limits apply throughout the year and are part of any SWPPP. Consider removing this section or revising to state something about extra care during wet season.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under Minimum Requirement #2 - it states that the SWPPP shall be a part of the Stormwater Site Plan. Ideally the SWPPP is a separate stand-alone document as it is a living document meant to change as conditions change and is only meant for use on a temporary basis. Revise language so that the Permit does not require the documentation to be a single document.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under Minimum Requirement #2 it is unclear why the following language was added to Appendix 1 as it is already a requirement contained in S5.C.5 of the Permit - "If erosion and sediment control requirements are not being met (i.e. sediment-laden water is leaving the site), then the local jurisdiction shall require that the contractor maintain the existing BMPs or implement other BMPs as appropriate."	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	It is suggested to remove reference to BMP C240 and BMP C241 - there may be different BMPs that are more appropriate to a given site and as written the language forces the use of BMPs that may not be appropriate.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.2 - Element #4.e - The way this is written makes it sounds like it is preferred or required to direct dirty stormwater to the natural buffers. Is that the intent?	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.2 - Element #6. WWHM does not have a "landscaped" category. Consider changing to lawn.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.2 - Element #8. It is unclear if the intent is to ensure that temporary conveyance channels can fully contain the flowrates from the 10-year storm events. Include additional language. Additionally, WWHM does not have a "landscaped" category. Consider changing to lawn.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.2 - Element #9.d - Consider revising as follows for clarity: "Discharge wheel wash or tire bath wastewater to the sanitary system (with local sewer district approval) or to a separate onsite treatment system that does not allow discharge to the MS4 or Waters of the State."	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.2 - Element #9.e - Application of fertilizers and pesticides is not typically part of site construction and may not be appropriate for this section.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.2: Element #10a. - This statement appears to imply that a sediment trap or sediment pond is required for all projects that have dewatering. A sediment trap/pond is not the best BMP option for all project types. Consider revising statement.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.2: Element #10b. This statement appears to say that dewatering water should not go through any sediment BMP, a. on the other hand appears to state that dewatering water must go through to a sediment trap. Revise language to avoid confusion. Change "surface waters of the state" to "waters of the state" or define surface waters of the state.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under Element #13 the additional of (Infiltration BMPs) is misleading when compared to the definition of an LID BMP. If the intent of this section is to solely protect BMPs that infiltrate clearly state that.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	It is suggested to update Element #13 to protect all permanent BMPs and to not limit this element to infiltrative BMPs only.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Source control BMPs more appropriately apply to activities that occur at sites as opposed to projects. Section S5.C.8 of the Permit appears to most appropriately cover the application of operational source control BMPs for a project. This section should really only cover structural BMPs that must be installed as part of the new development and redevelopment projects. Consider revising language to more clearly state the connection between S5.C.8 and how this requirement is really meant to apply to new development and redevelopment projects.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.4 - Define natural drainage patterns. In the ultra-urban environment, the natural drainage patterns have long been changed due to development and installation of conveyance systems. The application in the urban environment is not practical. How this MR applies is not clear for the urban environment? Consider creating additional language as to the intent in the urban environment.	City of Tacoma

MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Minimum Requirement #4 uses the term outfall which is a defined term for the point where the MS4 enters the receiving waterbody. Is the intent here to mean outlet? Outfall construction is a very rare occurrence in urban environments.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.5 - Define stormwater management BMPs or use a defined term.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.5 - Define Flow Control BMPs	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Appendix 1 requires the use of BMP T5.13 when utilizing the option of LID Performance Standard. The use of this BMP should not be required when not feasible. Update the language to state, when feasible. Also, modeling allows BMP T5.13 to be used to help meet the flow control requirement - if it is also required, can it be used in the modeling as well?	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.5: The List Approach - It is stated, "For each surface, evaluate the feasibility of the BMPs in the order listed, and use the first BMP that is considered feasible. No other BMP from the list is necessary for that surface. If all BMPs in the list are infeasible, then the designer must document the site conditions and infeasibility criteria used to deem the BMP infeasible." The way this is written, it would not be required to demonstrate infeasibility of something further up on the list if something lower on the list was chosen. This is not likely the intent, consider rewriting this section to require infeasibility documentation for any BMP that is deemed infeasible even if "all BMPs in the list infeasible".	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.5: Provide a reason for the required order of preference for use for Flow Control Exempt Projects.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.6: Provide data that substantiates the change from 5,000 square feet or more of pollution generating hard surface to 2,000 square feet of pollution generating hard surface.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.6: Under enhanced treatment, define sites subject to industrial activities, commercial project sites, multifamily residential project sites, commercial and industrial areas, designated for aquatic life use or that have an existing aquatic life use.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.6: Provide data that substantiates the traffic numbers and locations added for when enhanced treatment is required.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.6: There is a problem when determining if basic or enhanced is required. The words say 50% or more of the TDA requires: the basic treatment section says 50% or more and the enhanced treatment section says 50% or more so it is unclear when one would apply if 50%.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.6: Change Runoff Treatment to Stormwater Treatment. Runoff treatment is not a defined term in Appendix 1 of the SWMMWW. Stormwater treatment BMPs are defined in the Permit body glossary.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.7: TDA Exemption - It appears that Salt Waterbodies were added to the Flow Control Exempt Waterbodies List and now additional hydraulic analyses of the stormwater conveyance system are required. It is unclear why Ecology is considering regulating conveyance system design. Remove the hydraulic capacity requirement from this section to ensure Ecology is not regulating conveyance system capacity design.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.7: TDA Exemption - Define sufficient hydraulic capacity for the conveyance system.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 4.7: Basin Plans: "Basin Plans may also be used to demonstrate an equivalent level of...regional stormwater facilities." The inclusion of this language is unclear and could be construed to mean that jurisdictions are required to have a reviewed and approved basin plan in order to utilize regional treatment facilities. Consider removing this sentence.	City of Tacoma
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Under Section 4, "..., as well as long-term funding mechanism that will support proper O&M." Consider changing mechanism to responsibility. The City may not be legally allowed to approve funding mechanisms.	
MS4 Permit: Appendix 1 (Phase I and Western Phase II)	Section 5 and 6: Provide a definition for adjustment, exception, and variance.	City of Tacoma
SWMMWW Item 4: PCB Edits - Source Control BMPs	Under S424 - it is unclear at what point an applicant would be required to remove PCB containing exterior building materials. Is this language meant to imply if an applicant is redeveloping a site and that redevelopment does not include touching existing structures that those structures would now have to undergo PCB abatement?	City of Tacoma
SWMMWW Item 4: PCB Edits - Source Control BMPs	Under S424 - Applicable Operational Source Control BMPs indicates "avoid pressure washing areas and materials that contain, or likely to contain, PCBs..." What is the alternative?	City of Tacoma
SWMMWW Item 4: PCB Edits - Source Control BMPs	Under S431 - Is there a definition of "low pressure". Additionally, in one portion of the BMP it appears to indicate that low pressure washing is not acceptable and in another indicates that low pressure washing is allowed, please clarify.	City of Tacoma
SWMMWW Item 4: PCB Edits - Source Control BMPs	Under S431 - Under Recommended Additional BMPs it states "also avoid washing paint..." If someone wants to repaint a structure, washing is often needed to ensure that the paint will adhere to the current paint. This section just says washing - recommend changing to pressure washing if this is to remain.	City of Tacoma

