

Vol #	Section & Page #	Commenting on	Concern, Rationale, basis for comment	Suggestion or Alternative Approach
1	Section 2-3	Road Maintenance	Not exempting some pavement preservation activities will create additional work loads that agencies are already find challenging.	Adding a paragraph below exemption - Noting road preservation/maintenance-without expanding the pavement prism and then deleting the bullet beneath road maintenance that notes replacing a paved surface down to road base. In the course of replacing numerous small diameter cross culverts, driveway culverts, adding to driveway and road approach radii, etc. this happens frequently throughout the county. We do not see the need to apply Minimum Requirements #1-#5 for the these routine maintenance projects, especially if it is in the footprint of the repaired section. Apply it only on Capital projects.
1	Section 2-4	Definitions Related	Arterial - modify existing definition to reflect actual transportation language	Use Highway Runoff Manual or Thurston Co. DDECM
1	Section 2-4		converted pervious surface - modify language	Land cover changed from native vegetation to lawn, landscape, or pasture areas.
1	Section 2-4		Effective Impervious Surface	Downspout Infiltration systems are trench or drywell designs intended only for use in infiltrating runoff from roof downspout drains. They are not designed to directly infiltrate runoff from pollutant-generating impervious surfaces. Needs additional clarification
1	Section 2-5		Hard Surface- This does not meet federal def. for green roof. LID definition is different - Hard surfaces can be impervious or permeable. Permeable pavements are pervious surfaces, but also hard surfaces.	
1	Section 2-6		Low Impact Development -Puget Sound Partnership def - LID is a stormwater management and land development strategy applied at the parcel and subdivision scale that emphasizes conservation and use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely mimic pre-development hydrologic functions	Be consistent throughout definitions for WA. State - look at stormwater management (not land use)
	Section 2-6		Maintenance	Please add Preservation, repair and maintenance at the beginning of the sentence
1	Section 2-6	Definitions Related to Minimum Requirements	currently DOE does not include def. of normal maintenance or normal repair in the NPDES or Stormwater Manual	insert "Normal Maintenance" which includes those usual acts ot prevent a decline, lapse or cessation from a lawfully established condition. "Normal Repair" means to restore a development or structure to a state comparable to its original size, shape, configuration and external appearance. This must be done within a reasonable period of time after the decay or partial destruction. Replacement of the development or structure (comparable to the original) may be exempted where that is the common method of repair. Neither repair nor replacement should be exempted where such action would cause substantial adverse effects to shoreline resources or the environment.
1	Section 2-7		permeable pavement - include pervious asphalt	
1	Section 2-8		Rain Garden - it mentions non-engineered	remove non-engineered - it should not matter if an engineer or non-engineer designs one.
1	Section 2-9		Receiving waters - remove ground-water for definition	should be addressed in S4.F permit compliance language
1				
1	Section 2-10	Applicability of		
1	Section 2-11	Figure 2.4.1 - Flow	remove "plus replaced"	Road Maintenance Operations should be exempt
1				
1	Appendix 1-E	Flow Control-Exempt Surface Waters	Fifth bullet down - Remove Ordinary High Water Line (Ordinary high-water mark referenced in Volume II page 4-24 in Desiging and installation specifications for BMP C121)	From HW runoff Manual -insert Ordinary High Water Mark of the exempt receiving water, unless in order to avoid construction activities in sensitive areas, flow are properly dispersed before reaching the buffer zone of the sensitive areas or critical area

1	Appendix 1-E	Add additional exemptions (Exemption language better suites public works	Be consistent with the Highway Run-off Manual
1	Appendix 1-F	Feasibility Criteria for Selected LID Best	Thurston County has already commented on LID and will refer to them throughout.	
1	Glossary -4	Glossary and	Arterial - modify existing definition to reflect actual transportation language	Use Highway Runoff Manual or Thurston Co. DDECM
1	Glossary -30	Low Impact	remove "and land use" in defintion	
1	Glossary -31	Low Impact Development - Best	Language in definition for BMP's	inconsitent with LID manual. Consider changing BMP's to features or another term. BMP's are commonly used for many different activities.
1	Glossary -40	Rain Garden	Remove - non- engineered	
1	Glossary -41	Receiving waters	Remove the term Ground water	
	Glossary - 53	Insert "Waters of the		
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II	Glossary ii	AKART	Remove symbol after the period.	
II	page 3-14	Under Additional	disbursement - confusing and remove every 10 feet	
II	Page 4-83	Check dams C207	Design and installation specs.	use of hydro dams (climacover) work excellent either with a pump or gravity
II	Page 4-97	Straw Bale Barrier	Add back to BMP list: maybe not as a stand alone, however just like any other BMP it can fail based on neglect.	
II				