

February 2, 2018

Abbey Stockwell
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Comments on 2019 Western Washington Municipal Stormwater Permits- Long Term Municipal Stormwater Planning Framework

Dear Ms. Stockwell,

On behalf of Futurewise, we want to provide preliminary input on the draft section on "Long term MS4 planning to protect and recover receiving waters." We appreciate the opportunity to comment on this initial draft.

As a statewide non-profit organization focused on land use planning that supports livable communities and preservation of natural resources, Futurewise believes that watershed planning is a critical component of the NPDES Municipal stormwater permit ("Permit"). The benefits that forests, rural landscapes, and open space can provide to healthy watersheds through natural attenuation of stormwater pollution and slower delivery of runoff to streams is one of the important reasons for preventing urban sprawl in Washington.

We appreciate the Department's acknowledgement that all conventional tools, including flow control, runoff treatment, and low impact development will not achieve beneficial uses in our streams, especially with continued growth pressure. We also appreciate that stormwater managers generally do not have the authority to implement land use designations or zoning code changes as part of comprehensive planning, despite knowing these are low cost and effective tools to protect water quality and provide other community benefits. Watershed planning through the Permit can provide a vehicle for multi-department teams to prioritize actions to fulfill permit requirements that include evaluating current zoning and integrating stormwater planning with Growth Management Act (GMA) planning.

We have a couple of concerns and comments about the current draft for the long-term stormwater planning framework:

- 1.) *Objectives*: The requirements for the next 5-year permit cycle should go beyond identifying actions and developing a proposed plan for basins. Jurisdictions, especially those that already have done watershed planning (Phase 1 municipalities) should be required to begin implementation and demonstration of water quality benefits by the end of the permit cycle.
- 2.) *Methods/Procedure for Prioritizing basins*: In addition to these three priority areas, priority should be given to basins where actions would have

environmental justice benefits, basins where there is high development pressure, basins where potential flooding from climate change can be mitigated, and basins where there is high potential for green stormwater infrastructure (which has many other community benefits).

- 3.) *Approach/methods for catchment area planning:* When considering “other actions” to protect or recover a water body, protection or expansion of forested areas should be explicitly considered, since there are so many related benefits of forests in planning for climate change and potential jobs in natural resource-dependent economies.

Also in catchment area planning, integration of stormwater planning with GMA planning should be required part of the watershed plan, instead of an optional “additional action.”

Thank you again for the opportunity to help shape this draft section. We look forward to continuing conversations with you as the Permit is developed and anticipate making further comments as the Permit is finalized.

Sincerely,

Amy Waterman
Water, Fish, and Wildlife Program Director
Futurewise