

# Elsie Hulsizer

I am writing to provide comments on the Draft Municipal Stormwater Permits for Phase I and Phase II permittees in Western Washington. I believe that Stormwater permits are the most effective way to reduce polluted stormwater and stop the decline of our orcas and salmon.

I would like to see Ecology strengthen permits in four key areas:

1.Environmental Justice: The 2019 municipal stormwater permits have not done enough to advance Ecology's own goals to achieve environmental protections for all Washingtonians. Ecology should do more to eliminate incentives that favor wealthier, whiter neighborhoods while ignoring those communities most affected by stormwater pollution and most in need of investments in infrastructure and green solutions. At the same time, wealthier communities must not be let off the hook.

2.Transparency: Similarly, Ecology must require cities and counties to undertake more public engagement as they draft watershed plans.

3.Retrofit Action. Ecology should require all permittees to make retrofits and implement a meaningful number of projects to achieve real water quality improvements.

4.Closing Loopholes for Developers: High minimum thresholds and loopholes allow developers to skirt requirements for low-impact development (LID) in big projects. The thresholds should be reduced so that more development projects use LID, and loopholes must be eliminated before the 2019-2022 permits are finalized.

This is a critical time to increase protection for Puget Sound. Please strengthen our stormwater permits to curb polluted runoff and protect our orcas, salmon and communities.