

# Alexander Bryant

This is my comment on the Draft Municipal Stormwater Permits for Phase I and Phase II permittees in Western Washington.

We need strong permits to protect Puget Sound communities. Polluted stormwater runoff is, alarmingly, the number one source of toxic pollution into Puget Sound.

The permits are the most direct way to reduce this threat throughout our region. They are not popular with big-money, self-interested, short-sighted, profits-first corporations, I know. But they are not who you serve. Also, polluting corporations who do not lend a hand in their own cleanup are assholes. We do not listen to or deal kindly with self-absorbed assholes.

We must have strong stormwater permits, now more than ever, to stop the decline of our signature species. We need to continue working toward a healthy estuary for generations to come because that is how responsible governing works.

Strengthen the permits in the following ways, please:

1. Environmental Justice: 2019 municipal stormwater permits need to advance YOUR OWN GOALS and achieve environmental protections for all Washingtonians. Ecology should review its stormwater program through an environmental justice lens, eliminating incentives that continue the flow of resources and progress into wealthier, whiter neighborhoods while ignoring those communities most affected by stormwater pollution and most in need of investments in infrastructure and green solutions.
2. Transparency: Ecology must lean on cities and counties to undertake meaningful, inclusive public engagement as they draft watershed plans and make decisions that will directly impact our communities.
3. Retrofit Action: Cities and counties should be fixing areas with no stormwater treatment, but Ecology has excluded nearly all Puget Sound municipalities from requirements to take action during this permit cycle. Act now. Ecology must require all permittees to make retrofits now and implement a meaningful number of projects to achieve real water quality improvements.
4. Closing Loopholes for Developers: In the current draft documents, there are high minimum thresholds and loopholes allowing developers to skirt past requirements for low-impact development (LID) in big projects. You know as well as I do that LID is essential for protecting water quality from toxic stormwater runoff from development. Reduce the thresholds! Development projects must 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. Strengthen our stormwater permits to protect our orcas, salmon and communities.