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Non-point source pollution is the elephant in the room when it comes to outstanding water quality issues. In King County, we live with a mix of urban and Rural areas, each with its own blend of concerns. Since I live in the Rural area, I am acutely aware of the value of the watersheds that originate in our area.

Enforcing the State Growth Management Act and our Sensitive Areas ordinances out here are perhaps the most important tools we have in this regard. By protecting our remaining forest coverage, limiting impervious surfaces and preserving our agricultural resources, especially in the floodplains of our valley rivers, the Rural Areas can continue to provide the bulk of our clean surface water supply into the Puget Sound.

However, this can quickly be lost if either the letter of the law or our enforcement mechanisms are degraded. Unfortunately, code enforcement in King County is all but absent at this time.

This negligence on the County's part, rooted in a faulty funding system for DEPR, presents an existential threat to much of what we most value and identify as being at the heart of our region, the land of the Ish Rivers.

As a member of Futurewise, I approve of the rest of this message:

I am writing to provide comments on the Draft Municipal Stormwater Permits for Phase I and Phase II permittees in Western Washington. We need strong stormwater permits to better protect Puget Sound communities, salmon and orcas.

Polluted stormwater runoff is the number one source of toxic pollution into Puget Sound, and these permits are the most direct way to reduce this threat throughout our region. We must have strong stormwater permits, now more than ever, to stop the decline of our orcas and salmon and continue working toward a healthy estuary for generations to come.

I believe the permits must be strengthened in four key areas to ensure the best outcomes for Puget Sound:

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 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: Similarly, Ecology must make sure that cities and counties are required 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. Puget Sound can't wait another 5 years while the time to act is now. Ecology should 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. LID is essential for protecting water quality from toxic stormwater runoff from development. 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.