

# Berl Nussbaum

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 we plan 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.