

MIC Executive Committee June 28, 2019

Dear Mr. Porter:

Johnny Bianchi **Industry Space** Co-chair

Travis Porter Washington State Department of Ecology PO Box 47696 Olympia, WA 98504-7696

Kathleen Goodman Wood PLC

Co-chair

Warren Aakervik Ballard Oil

Scott Anderson CSR Marine

> **Marc Doan** GM Nameplate

> **Adam Grim** Machinists Inc.

Johan Hellman **BNSF**

> Pat Jablonski **NUCOR Steel**

Sara Nelson Fremont Brewing

Jordan Royer Pacific Merchant Shipping Association

> **Pete Stoltz** CalPortland

Richard White The Boeing Company

> Lindsay Wolpa Port of Seattle

The Manufacturing Industrial Council of Seattle is working with labor, business and environmental groups that are eager to help the Washington State Department of Ecology develop a more effective and more equitable regional system for stormwater management.

Present challenges were driven home for our group when we reviewed PARIS compliance records for 2017. These appear to confirm anecdotal reports from our members about their frustrations involving US EPA, state staff training practices that appear to vary by regions within the state, and dubious litigation practices based on antiquated, Nixon-era provisions of the US Clean Water Act.

These systemic concerns now cloud the very significant practical challenges that face our region as we continue to search for better approaches. Our discussions with other stakeholders reveal several good ideas for new approaches. We appreciate the opportunity to bring these ideas forward for DOE review and we look forward to working with you on these issues in the months ahead.

Sincerely,

Dave Gering.

Executive Director

Manufacturing Industrial Council of Seattle