



February 25, 2022

Ms. Abbey Stockwell  
Department of Ecology  
300 Desmond Dr SE  
Lacey, WA 98503

RE: Early Input for 2024 Phase I and Phase II Municipal Stormwater Permits

Dear Ms. Stockwell,

I write on behalf of the Jamestown S'Klallam Tribe, whose resources and treaty rights are reliant on cold, clean and abundant water. Jamestown Tribe urges stormwater permit requirements that assure tribal and all citizens of Washington can harvest and consume aquatic resources without increased likelihood of illness from chemical contamination. Jamestown Tribe is concerned the reissuance of Phase I and II permits, as proposed, will perpetuate impacts to salmon and other tribal resources.

Currently 6PPD-quinone and chemicals of emerging concerns have been found to highly impact Coho salmon and are not being addressed by this permit. Current total maximum daily load (TMDL) studies do not address heavy metals that are being transported in stormwater to the Puget Sound. Nonetheless, stormwater is understood to be deeply problematic to Puget Sound's aquatic health; including bioaccumulation of toxins in higher trophic levels.

We urge the Department of Ecology to work with permittees to update their stormwater infrastructure to meet today's environmental health concerns. It is our understanding that at the current rate of stormwater infrastructure updates and replacements, we will have inadequate infrastructure in place for at least the next 50 years.

Washington Department of Fish and Wildlife identified the use of Site Potential Tree Height as the recommended riparian width that can help with pollution removal. We urge that the Department of Ecology encourage communities to do a complete assessment of their natural stormwater infrastructure and use the site potential tree height to attenuate pollution through the use of a larger swath of land and natural ecological functions to clean up the stormwater before it reaches the Puget Sound.

Finally, we disagree with the following wording “The Permittee shall reduce the discharge of pollutants to the Maximum Extent Practicable (MEP). This is not specifically defined, and we would ask, practicable for whom? Certainly, this does not take into consideration Tribal treaty rights, or even Tribal resource that continue to be harmed by water pollution. Stormwater quality levels must be set and met, regardless of permittee interpretations of MEP.

If we can be of any further assistance or clarification of our views, please do not hesitate to call me at (360) 681-4601 or e-mail at [hhals@jamestowntribe.org](mailto:hhals@jamestowntribe.org).

Sincerely,

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