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To: Abbey Stockwell
Phase II Municipal Stormwater Permit Writer
Emma Trewhitt
Phase I Municipal Stormwater Permit Writer
Department of Ecology
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Transmitted Via Electronic Form:
http://wq.ecology.commentinput.com/?id=BYgm8&utm_medium=email&utm_source=govdelivery

25 Feb 2022

RE: 2024 Phase I & II Municipal Stormwater Permits Informal Comment Period

Dear Ms. Stockwell and Ms. Trewhitt,

Thank you for the opportunity to provide early input in the 2024 Municipal Stormwater General Permit. Our organization resides in a Phase II permit area and our comments are more focused on that permit version.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution–all critical issues affecting our region. Our North Sound Baykeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

Stormwater continues to be the largest source of toxic chemicals into the Salish Sea and these chemicals have acute and long term effects on the freshwater and marine water ecosystems. Pre-spawn mortality of Coho salmon from 6PPD quinone exposure and bioaccumulation of PCB's in Chinook Salmon and Orca whales are well documented examples[1,2]. Our organization has been monitoring stormwater flowing into Bellingham

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Bay for the last year and our data shows that stormwater chronically exceeds Washington State water quality standards. This data suggests that the current Stormwater Permits, Best Management Practices, and use of All Known Available, and Reasonable methods of prevention, control, and Treatment (AKART) are not preventing and controlling pollution of waters of the State of Washington. *Overall, we wish for a stronger, more protective permit that will expedite the protection of our water ecosystems*.

Structural Stormwater Controls

Stormwater retrofit projects are essential to filtering out stormwater and we encourage that these become a priority and that Phase II permit holders are required to implement them. Several of the Phase II permit holders are nearing or at population levels of Phase I permit holders and their cumulative impacts are significant. In addition, stormwater controls need to be placed in strategic areas, not convenient areas, and should control and account for 6PPD quinone. Retrofits in heavily urbanized areas where there are urban creeks and waterways that are impacted by industry and impervious surfaces are often the most expensive projects to carry out, but they are also the places most in need of improvements. *The permit needs to include a mechanism that prioritizes heavily impacted areas over less impacted areas, regardless of cost or difficulty.*

Outfall Mapping:

We would like to see increased transparency and clarity in the location of outfalls. In our monitoring experience we have found it difficult to locate outfalls as many of them are underwater at medium to high tides, therefore, providing elevation would be helpful. Also, having stormwater outfall locations along with their drainage basin information in a central, easy to access database would allow the public to find this information. There are environmental organizations, like ourselves, along with community members who are interested in becoming more informed with stormwater outfall water quality and access to the outfall locations is necessary.

Public Education and Outreach:

Our organization provides stormwater educational and outreach materials to schools and community members in Whatcom and Skagit counties. It takes significant time and resources to develop and deliver materials that use the best available science and incorporate effective pedagogies. It appears that other organizations and permit holders across the region are faced with a similar situation. We would like to see a public

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repository for stormwater related education and outreach materials. Currently the materials are hard to find and scattered across various sites. Stormwater engineers are provided with volumes of resources to facilitate their work, it would be great to provide this resource for educators as well

We would also like to see more research on which methodologies work and which ones don't. If we really want education and outreach programs to succeed, we need to research their effectiveness and stop wasting our time on ineffective strategies. The results of these studies, along with an interpretation, should also be made available to the public.

Environmental Justice

We would like to see Environmental Justice integrated into the SW Permit in an authentic manner. Municipalities should be transparent about how their work is done to ensure that stormwater work is occurring in a just manner across the landscape. Washington State has a great tool, the Washington Environmental Health Disparities Map, that can provide data to help this process.

Increase funding

Our experience working with Stormwater agencies in our county, such as the City of Bellingham, Port of Bellingham, and the Department of Ecology, has shown that there is a severe lack of funding and trained personnel to carry out all of the current permit requirements. We encourage Ecology to continue to lobby and search for additional funds to adequately staff the work that needs to be done to fully protect human health and the environment.

Interdisciplinary and transparent approach

Stormwater pollution is a community-wide problem that requires collaboration from a variety of agencies, industries, and community members across the landscape and should not be worked on in isolation. Increasing transparency (and ease at accessing materials) would be a logical first step. Forming partnerships with other agencies could also be beneficial so that work can be shared and redundancy can be reduced. For example, Ecology could work directly with the Department of Health to look at health disparities or with the Office of Superintendent of Public Education to collaborate on educational materials. Collaborating with industries on product replacement or Toxic-free Washington could also help with source control of toxic materials.

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Thank you for taking the time to read and consider our comments. We look forward to seeing this permit progress into something that is truly protective and curbs the continuing decline of our waterways.

Sincerely,

Kirsten McDade
Pollution Prevention Specialist

References:

[1] Tian et al. 2020. A ubiquitous tire rubber-derived chemical induces acute mortality in coho salmon. Science. Bol 371, NO. 6525. https://doi.org/10.1126/science.abd6951

[2] Dunagan, Christopher. 2016. New Theory rethinks the spread of PCBs and other toxins in Puget Sound. Encyclopedia of Puget Sound. Retrieved from: https://www.eopugetsound.org/magazine/pcb-theory