

November 9, 2023

Amanda Heye (Stormwater Management Manual for Western Washington Writer),
Abbey Stockwell (Phase II Municipal Stormwater Permit Writer), and
Amy Waterman (Phase I Municipal Stormwater Permit Writer)
Department of Ecology
300 Desmond Drive SE,
Lacey, WA 98503

Dear Ms. Heye, Ms. Stockwell, and Ms. Waterman,

The Puget Sound Partnership appreciates the opportunity to review and comment on the draft Stormwater Management Manual for Western Washington (SWMMWW) and the draft Municipal Separate Stormwater Sewer Systems (MS4s) permits for Phase I and Phase II permittees in Western Washington. Our agency focuses on Puget Sound recovery; therefore, we are not providing comments on permit changes to Eastern Washington. We are generally supportive of the Department of Ecology's efforts to promote state-wide consistency where it makes sense.

As the state agency leading our region's collective effort to protect and restore Puget Sound, we support every effort to improve water quality in Puget Sound and the greater Salish Sea ecosystem. The Partnership is committed to aligning the work of our partners around a shared vision and strategy to achieve the ecosystem recovery goals set for us by the Washington State Legislature. To achieve these goals, we coordinate with our diverse partners to develop the Action Agenda for Puget Sound—the comprehensive plan for addressing the many challenges facing Puget Sound and their human and natural causes. We are also responsible for recovering Endangered Species Act (ESA)-listed Chinook salmon and are currently updating the regional chapter of the Puget Sound Salmon Recovery Plan, which has strategies and actions for water quality and stormwater aligned with the Action Agenda.

Stormwater runoff is the largest source of pollution in Puget Sound, and ongoing studies continue to highlight the severe impact it has on water quality, endangered species (particularly salmon and orcas), critical infrastructure, and human health. Puget Sound recovery is unlikely if our region does not significantly reduce the impacts of stormwater runoff. The Partnership is broadly supportive of the draft SWMMWW and the MS4 permits and believes the proposed changes will result in more stormwater runoff being captured, infiltrated and/or treated before reaching Puget Sound and its tributaries. Polluted stormwater runoff has a significant impact on our region, and our comments focus on how the draft manual and permits align with the Action Agenda strategies and actions to reduce pollution from stormwater runoff. In addition to this letter, we submitted comments via Ecology's Draft Comments Excel Template.

Alignment with the Puget Sound Partnership and Action Agenda

For Puget Sound to be healthy and resilient, the Partnership has five major goals for ecosystem recovery in the Action Agenda: protecting and restoring habitat, protecting and improving water quality, protecting the food web and species, preventing and adapting to climate change, and advancing human well-being. Reducing pollution from stormwater runoff is a key strategy in the Action Agenda (Strategy 10) that contributes to all five goals. The best management practices (BMPs) in the SWMMWW and requirements in the MS4 permits align with and/or advance a majority of actions within this strategy. Throughout the letter, we note the other strategies and actions in the Action Agenda that relate to our comments.

We appreciate that the SWMMWW mentions the Puget Sound Partnership and the Action Agenda. This helps users of the manual to understand how their actions to address stormwater contribute to the region's comprehensive ecosystem recovery efforts. It also helps raise awareness of the Action Agenda and the actions it calls on us to pursue. There are three main changes we recommend to the manual's description of the Action Agenda.

First, we recommend removing the reference to near term actions (NTAs), which were short-term, locally-driven proposals to advance projects or research related to Puget Sound recovery. The Partnership has moved away from the use of NTAs but continues to incorporate local priorities and projects in the current Action Agenda and throughout our recovery work.

The second recommendation is to reference Local Integrating Organizations (LIOs). As the manual notes, the Partnership continues to convene partners and coordinate actions related to three strategic initiatives: stormwater, habitat, and shellfish. Other important partners within the Partnership's recovery network are LIOs: forums composed of local jurisdictions (including staff from Phase I and Phase II municipalities), Tribes, non-profits, and citizens. There are ten LIOs in the Puget Sound region, each representing a different watershed and each guided by their locally-developed Ecosystem Recovery Plans. These plans outline specific strategies and actions that guide local ecosystem recovery and help inform Action Agenda strategies and actions at the regional level. Many permittees are involved in their local LIO committee, and we encourage all permittees to participate in these forums to advance cross-jurisdictional collaboration and coordination.

Finally, we recommend referencing the Puget Sound Ecosystem Monitoring Program (PSEMP). PSEMP is a collaborative network of subject matter experts from many monitoring organizations and different parts of the region. Together, they generate, organize, synthesize, and communicate scientific information across political and organizational boundaries to track ecosystem conditions that directly address management and science questions critical to Puget Sound recovery, including issues related to stormwater runoff. The PSEMP Stormwater Work Group focuses on weaving efforts related to permitting, effectiveness studies, and collaboration across interested parties, including the Stormwater Action Monitoring program. Both the manual and permits emphasize the importance of collaborative monitoring efforts to advance research and coordinate across jurisdictions. Permittees should be encouraged to participate in PSEMP work groups and share data with this network to ensure that municipalities are learning from each other, identifying issues as they emerge, coordinating a regional response, and tracking our collective progress.

Specific, red-lined edits to Volume 1 Chapter 2.4 of the Stormwater Management Manual for Western Washington (the section that describes the Partnership and the Action Agenda) are provided for Ecology’s consideration in Addendum A.

Support for New Permit Thresholds and Requirements

Action Agenda Connections:

Strategy 10 –	Action ID #31 – Encourage retrofits and restoration through education and incentives.
Stormwater	Action ID #36 – Adjust stormwater permitting requirements or other local government programs to address nutrients in stormwater from residential and commercial lands.

The Partnership is broadly supportive of the lower threshold requirements for new development and redevelopment projects. We are also supportive of Ecology’s continued emphasis on using Low-Impact Development (LID) as the preferred and commonly used solution to stormwater runoff. As our region’s population grows, the demand for new housing and other development will continue to rise. Done improperly, new development and redevelopment can increase pollution from stormwater runoff, so it is imperative that project thresholds and BMP requirements balance development needs with stormwater management needs. These new thresholds and standards move us in the right direction and should result in more stormwater runoff from development being captured and infiltrated.

The new thresholds and requirements for Phase II permittees in Western Washington bring these municipalities more in-line with Phase I permit standards for new development. The Partnership supports this, as many of the Phase II municipalities are now larger than some Phase I municipalities were when these permits were first issued. Increasing consistency across jurisdictions will also further accelerate the expansion of low-impact development throughout the region, and we support continued updates to these permits to align requirements and standards between Phase I and Phase II municipalities. One notable exception is the new retrofit requirement for Phase II municipalities. While the Partnership supports including retrofit requirements for these jurisdictions, we encourage Ecology to use the Stormwater Management for Existing Development (SMED) point system instead of the proposed level of effort scaled by population. The proposed level of effort (5 acres per 50,000 people) for Phase II municipalities would require treatment of runoff from 0.3 to 15 acres, which is substantially less than what is needed and what Phase II municipalities have been treating.

While the Partnership is supportive of efforts to expand the use of low impact development, we also recognize that many stormwater projects (like bioretention cells, rain gardens, and trees) may be cared for by a business or property owner who was not involved with the project’s installation and may not be knowledgeable of the maintenance needs of the project. Without appropriate education from a developer (who typically installs the project) to the property owner, the likelihood of long-term and on-going maintenance of stormwater facilities decrease. These new thresholds are likely to result in many more stormwater facilities, and the permits should encourage permittees to couple maintenance inspections with technical assistance and

educational resources to a facility’s owner. Such an effort will require more staff, but the investment now will likely pay off by increasing the long-term success of stormwater facilities.

Support for Addressing Emerging Toxics of Concern

Action Agenda Connections:

Strategy 8 – Toxic Chemical Pollution	Action ID #43 – Prioritize, prevent, and manage chemicals of emerging concern.
Strategy 10 – Stormwater	Action ID #36 – Adjust stormwater permitting requirements or other local government programs to address nutrients in stormwater from residential and commercial lands.
	Action ID #41 – Find and fix toxic hotspots.

The draft permits explicitly name PCBs and PFAS for specific source control BMPs. These classes of chemicals are increasingly of concern because of their impact on human health and aquatic life. Unfortunately, both chemical classes are persistent, and in the case of PFAS, still widely used in industry and consumer products today. The draft source control BMPs and requirements for both chemicals in the permit will likely reduce PCB and PFAS discharges into waterways. We also encourage Ecology to monitor the effectiveness of emerging technologies that can reduce or eliminate these chemicals from industrial storm and waste water. Such technologies, if effective, could be incentivized or required in future permits.

The Partnership also strongly supports an increased focus on 6PPD-quinone in the permits and manual. Emerging research has shown that this chemical, found in tires and concentrated on roads and parking lots, is one of the most toxic components of stormwater runoff for aquatic life and some salmonids, particularly coho salmon. The impact of 6PPD-quinone on salmon recently prompted the Affiliated Tribes of Northwest Indians (ATNI) to pass Resolution #2023-52: Calling on the Environmental Protection Agency to ban the manufacturing, processing, and use of 6PPD in tires. Reducing the impact of this chemical should be a top priority to the state, and these permits should explicitly name 6PPD as soon as possible. The permits could contain language similar to that in S2.B.3.a related to PFAHS: “No later than 12/31/2026, the Permittee shall coordinate with firefighting agencies/departments that serve the areas that drain to the MS4 to develop a PFAS management plan which will implement measures to minimize discharges of PHAS via the MS4 during emergency firefighting activities.” This language could be modified to direct permittees to work with their transportation/roads/public works departments to develop a plan that reduces 6PPD in the MS4 via source control BMPs (street sweeping, reduction in roads/parking lots, etc.) and treatment BMPs (bioretention along roads, prioritizing retrofits along most trafficked roads).

The Partnership supports the new street sweeping requirements and expanding the use of bioretention facilities to treat road runoff. Both BMPs have been shown to reduce the amount of 6PPD-quinone entering our waterways and salmon-bearing streams. With regards to street sweeping, the Partnership encourages Ecology to work with permittees to ensure that wastewater from street sweepers is properly treated and not discharged directly into storm drains, which would be allowed under the draft permit if other treatment options are infeasible. This allowance could undermine the intent of the street sweeping requirements and should be addressed quickly. In addition to these BMPs, permittees can further reduce 6PPD-quinone by removing “car

habitat.” As a source control BMP, permittees could be encouraged to inventory their roads and parking lots to identify stranded and over-sized assets that can be removed or reduced.

Integrating Environmental Justice

Action Agenda Connections:

Strategy 21 – Place Attachment	Action ID #157 – Ensure place attachments among all residents of Puget Sound are recognized, understood, and respected.
Strategy 23 – Good Governance	Action ID #78 – Engage with community groups, educational institutions, and communication specialists to develop and share relevant, transcreated, and accessible information on civic engagement and decision-making opportunities.
	Action ID #161 – Ecosystem recovery processes and decision making are inclusive of a broader set of committed stakeholders, including vulnerable populations and underserved communities, and diverse forms of knowledge.
	Action ID #162 – Increase capacity for vulnerable populations and underserved communities to engage in environmental decision-making.
	Action ID #163 – Increase trust by including and communicating directly and effectively with new and diverse audiences.
	Action ID #197 – Honor tribal nations’ treaty and sovereign rights, obligations and inherent sovereign interests when considering implementation of Puget Sound recovery projects and programs, and actively engage with tribal nations to align and incorporate shared goals.
Strategy 26 – Human Health	Action ID #112 – Direct beneficial environmental activities, investments, and community research towards better understanding and improving areas with environmental health disparities and where the environmental health improvements will be greatest.
	Action ID #200 – Limit people’s exposures to harmful water pollution.
Institutional Strategy B – Strategic Leadership and Collaboration	Action #128 – Advance diversity, equity, inclusion, and environmental justice in Puget Sound recovery efforts.

In 2021, Washington passed the Healthy Environment for All (HEAL) Act, requiring seven state agencies (Ecology, Health, Agriculture, Commerce, Natural Resources, Transportation, and the Puget Sound Partnership) to meaningfully advance environmental justice, engage vulnerable populations and overburdened communities, and reduce health disparities throughout our state. The Action Agenda also calls for Puget Sound recovery efforts to advance environmental justice and reduce barriers for community engagement. According to the Washington State Department of Health, stormwater runoff (like many types of pollution) has a disproportionate impact on low-income neighborhoods, people of color, and Indigenous communities.

The Environmental Justice Principles created by the state’s [Environmental Justice Task Force](#) are:

1. Achieve the highest attainable environmental quality and health outcomes for all people.
2. Adopt a racial justice lens.
3. Engage community meaningfully.
4. Be transparent.
5. Be accountable.

There are several opportunities for Ecology to further integrate these principles into the permits, particularly with the requirements for Stormwater Management Programs (SWMPs). For example, permittees could be asked to integrate the above Environmental Justice principles into their SWMPs (S5.A). Environmental justice can also be integrated into decision-making processes, such as the Stormwater Planning program required by the permit, which directs permittees to convene an inter-disciplinary team (S5.C.6.a). The permit could explicitly direct permittees to include individuals who live in/are members of vulnerable populations and overburdened communities. Such inclusion values the lived experiences of people who have been marginalized by past decisions and integrates them into a decision-making process to aid in directing resources and identifying priorities.

The minimum performance measures for SMED programs could also be revised to align with the [federal government’s Justice 40 Initiative](#), which requires at least 40% of SMED program points be from projects in vulnerable and overburdened communities (S5.C.7.d). This would align state and federal approaches and ensure that permittees are serving vulnerable and overburdened communities. Permittees can use the state’s [Environmental Health Disparities map](#) and guidance from the [Environmental Justice Council](#) to identify and further prioritize these areas for stormwater investments (S5.C.2).

Honoring Tribal Nations

Action Agenda Connections:

Strategy 15 – Salmon Recovery	Action ID #206 – Ensure sustainable harvest of hatchery and natural salmon and support treaty-reserved fishing rights.
Strategy 21 – Place Attachment	Action ID #157 – Ensure place attachments among all residents of Puget Sound are recognized, understood, and respected.
Strategy 23 – Good Governance	Action ID #78 – Engage with community groups, educational institutions, and communication specialists to develop and share relevant, transcreated, and accessible information on civic engagement and decision-making opportunities.
	Action ID #161 – Ecosystem recovery processes and decision making are inclusive of a broader set of committed stakeholders, including vulnerable populations and underserved communities, and diverse forms of knowledge.
	Action ID #162 – Increase capacity for vulnerable populations and underserved communities to engage in environmental decision-making.

	Action ID #163 – Increase trust by including and communicating directly and effectively with new and diverse audiences.
	Action ID #197 – Honor tribal nations’ treaty and sovereign rights, obligations and inherent sovereign interests when considering implementation of Puget Sound recovery projects and programs, and actively engage with tribal nations to align and incorporate shared goals.
Strategy 26 – Human Health	Action ID #112 – Direct beneficial environmental activities, investments, and community research towards better understanding and improving areas with environmental health disparities and where the environmental health improvements will be greatest.
	Action ID #200 – Limit people’s exposures to harmful water pollution.
Institutional Strategy B – Strategic Leadership and Collaboration	Action #128 – Advance diversity, equity, inclusion, and environmental justice in Puget Sound recovery efforts.

Washington State recognizes Indigenous peoples’ inherent right to exercise their language, cultural beliefs, protection of tribal resources, sense of place, and territory through their existence and inhabitation of Washington territory since time immemorial. The HEAL Act further prioritizes the reduction of exposure to environmental hazards within tribal lands, ensuring tribal sovereignty and rights, along with the environmental justice of eliminating environmental and health disparities in disadvantaged, vulnerable, and low-income populations.

It is important to recognize that polluted stormwater runoff impacts tribal treaty-protected resources, specifically salmon and shellfish. Not only does pollution degrade habitat and cause direct mortality of these species, it also degrades the quality of these critical food resources. Indigenous people consume more seafood than non-Indigenous people, and tribal members are at a heightened health risk for bioaccumulating toxics in their bodies by eating salmon and shellfish. We recommend that the permits and manual both recognize the impact stormwater has on treaty-protected resources along with the state’s obligation to co-manage and sustain these resources in collaboration with Tribal governments.

SWMP new mapping requirements (S5.C.2.b) could direct permittees to consult appropriate Tribal governments to identify treaty-protected resources (harvestable shellfish beds, salmon-bearing streams, etc.) and local usual and accustomed areas where tribal members have and continue to harvest these resources. Integrating treaty-protected resources into planning efforts can help permittees better understand which of these resources are most impacted by stormwater runoff and where to prioritize mitigation efforts.

Preparing for the Impacts of Climate Change

Action Agenda Connections:

Strategy 3 – Healthy Shorelines	Action ID #16 – Improve long-term strategic planning to reduce development impacts in the future across all land-use types.
Strategy 18 – Awareness of effects of Climate Change	Action ID #131 – Expand monitoring, research, and assessment of the individual and cumulative impacts and risks of climate change on Puget Sound.

	Action ID #133 – Educate and train decision makers and professionals about climate impacts and risks on Puget Sound.
	Action ID #135 – Improve networks for sharing information across public and private sectors.
Strategy 20 – Climate Adaptation and Resilience	Action #137 – Implement multi-benefit projects and programs that synergistically advance Puget Sound recovery goals and reduce greenhouse gas emissions, increase carbon sequestration in Puget Sound ecosystems, increase climate adaptation, and promote climate resilience.
	Action ID #148 – Develop and enhance guidance on best practices to reduce emissions and risks and adapt to the most impactful climate stressors.

A changing climate will impact much of what we value in the Pacific Northwest, and current global models suggest that climate change will continue, even with aggressive reductions in greenhouse gas emissions. While reducing emissions remains a critical component to reduce the worst impacts of climate change, our state must also prepare to adapt to the climate of the future. Changes in the timing, intensity, and duration of rain and snow events will impact stormwater facilities and management plans, so it is essential to integrate climate change into BMP designs and siting guidance.

The Partnership is encouraged that Ecology recognizes the impact that climate change will have on stormwater runoff, and we are eager to see emerging guidance from the agency as it completes modeling efforts for how stormwater facilities can be modified given changing precipitation and runoff patterns. We encourage Ecology to adopt a “plan for the worst, hope for the best” orientation when modeling climate scenarios. When guidance is available, we encourage Ecology to consider modifying and reissuing permits in accordance with G14 – General Permit Modification and Revocation (S4.G). Climate change will have a severe impact on stormwater runoff, and we believe updating these permits prior to their expiration in 2029 is warranted.

Climate change will also cause sea level rise, increasing tidal flooding in coastal and urban areas throughout the Puget Sound region. Sea level rise will likely lead to flooding and inundation of some pollution-generating surfaces, which would introduce pollutants from roads, parking lots, and ports directly into the ecosystem. This will negatively impact endangered species, such as salmon and orca, and have an adverse impact on human health and wellbeing. Sea level rise can also cause back-ups in storm drains with outfalls influenced by coastal tides, leading to urban flooding during high tides and increased risks for people living in these areas. We encourage Ecology to include sea level rise when updating its models and guidance to municipalities for how to incorporate climate change into their stormwater plans. Importantly, permittees should be discouraged from hardening shorelines as a mitigation strategy given that hardened shorelines work directly against critical Puget Sound ecosystem and salmon recovery goals.

Utilizing Trees to Reduce Stormwater Runoff

Action Agenda Connections:

Strategy 20 – Climate Adaptation and Resilience	<p>Action #137 – Implement multi-benefit projects and programs that synergistically advance Puget Sound recovery goals and reduce greenhouse gas emissions, increase carbon sequestration in Puget Sound ecosystems, increase climate adaptation, and promote climate resilience.</p> <p><i>Key opportunity: Encourage protection of existing tree canopy to ensure regionally sequestered carbon is preserved.</i></p>
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The Partnership supports the requirement for municipalities to adopt tree canopy goals as part of their MS4 permits. As Ecology acknowledges in the fact sheet, mature trees, particularly in urban environments, provide a multitude of ecosystem services, including reducing the impact of stormwater runoff. Many of the Phase I and Phase II permittees in the Puget Sound region already have tree canopy goals established, and all permittees in the region are updating their Comprehensive Growth Management Plans, which are due on either December 31st, 2024 or June 30th, 2025 (depending on the municipality). Requiring permittees to set their tree canopy goals by June 30th, 2025 (instead of December 31st 2028, S5.C.6.c.ii) ensures that tree protection considerations are implemented in tandem with new development and growth plans. We encourage Ecology to set an earlier deadline for permittees to establish a tree canopy goal.

In the draft permit, Ecology requires permittees to “adopt and implement tree canopy goals and policies to support stormwater management...” (S5.C.6.c.ii). We encourage permittees to adopt, in concert with tree canopy goals, policies related to soil volume, tree establishment, and tree retention. According to most urban foresters, the average lifespan of an urban tree is seven years, but the ecological benefits of a tree typically are not fully realized until the tree reaches eight to twelve years old. We encourage Ecology to add requirements for permittees to also adopt soil volume standards, tree establishment policies, and tree retention policies to ensure permittees are crafting a more holistic urban forestry policy framework.

Support for Regional Collaboration on Stormwater Management

Action Agenda Connections:

Strategy 10 – Stormwater	Action ID #3 – Conduct watershed-scale planning and land use planning to protect and restore water quality.
	Action ID #32 – Increase local stormwater management capacity.
	Action ID #41 – Find and fix toxic hotspots (information, planning, education, funding, and implementation).
Institutional Strategy A – Funding	Action ID #207 – Increase coordination, efficiency, and effectiveness of current funding programs to extend impact of current funding.
Institutional Strategy B – Strategic Leadership and Collaboration	Action ID #210 – Strengthen relationships and understanding to enhance collaboration.

Puget Sound recovery requires coordination between partners and among various planning efforts. The Partnership supports the inclusion of “Watershed Collaboration” as a project type in the new permits (S5.C.7.a.ii.g). By pooling resources and investing in regional solutions, permittees may be able to advance more holistic and cost-effective projects, like regional stormwater parks. These projects also have the potential to capture and infiltrate more polluted runoff.

For permittees engaging in a Watershed Collaboration in the Puget Sound region, we suggest that Ecology encourage them to integrate other regional plans, goals, and priorities into their efforts to reduce stormwater runoff. Polluted runoff and poor water quality has the ability to undermine investments in habitat and species restoration efforts. Permittees should pay special attention to how their stormwater systems and management plans impact and/or complement other Puget Sound recovery efforts, specifically those related to:

- Strategy 3: Shorelines,
- Strategy 4: Riparian areas,
- Strategy 5: Floodplains and estuaries,
- Strategy 15: Salmon recovery, and
- Strategy 16: Submerged aquatic vegetation.

Permittees could also consider the location of nearshore or riparian habitat restoration projects to guide decisions on mitigating nearby toxic hot spots and/or outfalls. For example, King County is working to advance bioretention retrofits along roadways with fish passage correction projects, reducing the impact of 6PPD-quinone on newly accessible salmon habitat. Coordinating projects like this can also allow permittees to better leverage capital project funds by pairing stormwater retrofits with planned construction and maintenance work.

Improving Education and Outreach

Action Agenda Connections:

Strategy 10 – Stormwater	Action ID #31 – Encourage retrofits and restoration through education and incentives.
	Action ID #35 – Develop and implement education and outreach and behavior change campaigns that fund projects to reduce nutrient impacts from residential, stormwater, and agricultural runoff.
Strategy 18 – Awareness of effects of Climate Change	Action ID #172 – Develop and implement social marketing (behavior change) strategies to influence climate-related behaviors.
Institutional Strategy A – Funding	Action ID #207 – Increase coordination, efficiency, and effectiveness of current funding programs to extend impact of current funding.
Institutional Strategy D – Education Partnerships	Action ID #189 – Coordinate planning and implementation across education and restoration partners networks.

Permittees are required to deliver an education and outreach program to increase awareness, advance behavior change, and create stewardship opportunities. These programs have the potential to reduce the residential use of chemicals, promote small-scale retrofits on private property, create new community green spaces, and shift public values. As these programs are

implemented, it is important to have measurable goals and standards so permittees can track progress and adapt as needed (language could be added to S5.C.11.a.iii). We are not suggesting that failure to meet education and outreach program goals and standards should be viewed as non-compliance with the permit, but should be used purely as an assessment tool for program improvements.

Developing and implementing successful education and outreach programs requires dedicated and qualified staff who are able to engage with diverse audiences and track progress on behavior change. For many smaller municipalities, staffing limitations have been cited as a major concern for complying with this aspect of the permits. Just as regional stormwater planning through Watershed Collaborations can more efficiently leverage permittee resources, collaborative education and outreach programs can lessen the financial burden on smaller jurisdictions and increase message consistency across the region. The permit allows permittees to meet education and outreach requirements via regional efforts (S5.C.11), and the Partnership encourages this sort of collaboration. Entities like Conservation Districts and county extension offices may be well-suited to lead inter-jurisdictional environmental education and outreach efforts.

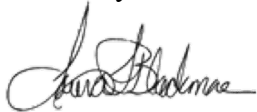
Lastly, as permittees implement outreach and education efforts, they should consider equity and environmental justice when identifying priority audiences. “Vulnerable populations and overburdened communities” are not identified as priority audiences in any of the sections under S5.C.11.a of the draft permits. Given the state’s new focus on environmental justice, we encourage Ecology to add these communities, as defined by the HEAL Act, as priority audiences for both general awareness (S5.C.11.a.i) and behavior change (S5.C.11.a.ii).

Conclusion

The Partnership is grateful for the work of the Department of Ecology to protect and restore Puget Sound. We support the proposed updates to the SWMWW and the MS4 permits for both Phase I and Phase II municipalities in Western Washington. Given the large impact and scale of stormwater runoff, it is incumbent on the entire Puget Sound recovery community to advance solutions that capture, treat, and/or infiltrate stormwater runoff before it reaches Puget Sound and its many tributaries.

We look forward to reviewing the final versions of the SWMWW and MS4 permits along with Ecology’s responses to our comments.

Sincerely,



Laura L. Blackmore
Executive Director