

PierceCountyWa.gov/PPW

Jen Tetatzin, PE, PMP - Director

November 3, 2023

WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504 - 7696

Subject: Pierce County Formal Comments Regarding the 2024 Formal Draft Phase 1 Municipal Stormwater General Permit – Language and Guidance

Dear Ecology:

Thank you for the opportunity to provide comments on the formal draft language for the 2024 Phase 1 Municipal Stormwater General Permit. Pierce County would like to offer comments and recommendations that would provide more clarity and consistency to permit conditions, while increasing the effectiveness of the permit to protect and improve water quality in receiving waters of Pierce County.

We appreciate the effort Ecology has already made to add clarifying language to the permit for existing programs. As our comments reflect, we continue to have concerns with the unintended impacts lowering thresholds poses to affordable housing and hope that Ecology will consider the need to increase housing supply in their final permit development. We also have concerns that the level of effort and ongoing cost required for the proposed street sweeping program will not provide an equal water quality benefit. We hope that Ecology will consider threshold exemptions for residential units and reduce the level of effort currently described in the proposed street sweeping program.

Additional and more detailed comments can be found in the attached worksheet.

Sincerely,



Jen Tetatzin, PE