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Ms.Stockwell,

These are belated comments on the Draft Phase II Municipal Stormwater NPDES Permit. I'm concerned about the impact of the proposed changes to Appendix 1 "Minimum Technical Requirements for New Development and Redevelopment," of the Western Phase II Municipal Stormwater NPDES Permit (Permit) on a city's ability to maintain its street network. A) The 2024 draft permit proposes to narrow the definition of preservation projects to those with the sole purpose of maintaining the pavement area (Appendix 1, Section 1 "Exemptions," "Pavement Maintenance"). However, project-based street maintenance funding almost categorically links to ancillary benefits, thus triggering all nine minimum requirements. B) The 2024 draft permit also proposes including 'replaced' surfaces in road projects' 5000 square foot threshold for Minimum Requirements 1-9 applicability (Appendix 1, Section 3.4).

Where can we find an economic impact analysis of these changes? While presumably there is some incremental benefit to water quality, these changes will certainly accelerate the "glide to failure" described earlier this year by Roger Millar, head of the Washington Department of Transportation (WSDOT), after the governor signed the transportation budget which provides only half the funding needed to preserve and fix our roads. According to WSDOT, it's facing an estimated \$11 billion budget shortfall over the next decade. This problem is typically more pronounced for municipalities, and the proposed changes will have the effect of reducing funds available for other priorities, including water quality and climate response.

I generally support the permit and thank-you for all your work.