



THE NORTHWEST
SEAPORT ALLIANCE

SEATTLE + TACOMA
nwseaportalliance.com

July 15, 2024

Lucienne Banning
General Permit Unit Supervisor
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

Re: Draft 2025 Industrial Stormwater General Permit Comments

Dear Ms. Banning,

The Northwest Seaport Alliance (NWSA) appreciates the opportunity to submit comments on the 2025 Industrial Stormwater General Permit (Permit). The NWSA, the marine cargo operating partnership of the Ports of Tacoma and Seattle, prides itself on being an environmental steward for port industries both within the state of Washington and internationally. Since 2016, we have spent over \$97 million to protect and enhance environmental quality through habitat restoration, innovative water quality improvements and shore power in both Tacoma and Seattle.

The NWSA is very concerned that Ecology is making numerous changes to the ISGP without explaining those changes or their justification, including changes that are not supported by a scientific basis to establish an improvement to water quality. The Permit already regulates over 1200 facilities in Washington, yet, in 2025, Ecology proposes to completely alter major definitions and requirements that are expected to greatly increase the number of businesses and public agencies subject to permit coverage. In addition, Ecology is adding numerous requirements to an already rigorous, complex and protective permit. Ecology has not provided data or science to explain the rationale for the proposed changes, despite a duty to do so. Compliance with these new requirements, which are unique to Washington, will add significant capital costs to the detriment of other planned environmental projects of proven efficacy. These proposed new requirements will increase cost to port operations, which poses risks to the Washington economy and our region's competitiveness without providing commensurate environmental benefits.

Ecology must provide clear and implementable regulations based on sound science and which demonstrate consideration of reasonable alternatives. Lack of clarity in permit requirements puts Washington businesses and public agencies at risk of not being successful, making investments without identifiable benefits, and renders these entities vulnerable to costly and time-consuming third-party

litigation. We acknowledge the value of clear and implementable regulation in safeguarding our natural environment.

Our attached comments provide recommendations to update the Draft ISGP permit in order to make it more implementable while still maintaining permit requirements to protect and enhance Washington's surface waters. We urge Ecology to consider these comments as you finalize the 2025 Industrial Stormwater General Permit.

Respectfully,



John Wolfe
Chief Executive Officer
The Northwest Seaport Alliance