

## Northwest Seaport Alliance

Thank you for the opportunity to review and comment on the Draft 2025 ISGP. Attached is a comment letter from The Northwest Seaport Alliance Commission Co-Chairs regarding the Draft 2025 ISGP.



**THE NORTHWEST**  
SEAPORT ALLIANCE

SEATTLE + TACOMA

[nwseaportalliance.com](http://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,

As Co-Chairs of The Northwest Seaport Alliance, Vice President of the Port of Seattle Commission, and President of the Port of Tacoma Commission, we are deeply concerned with the scope and gravity of the proposed changes to the Industrial Stormwater General Permit.

Ecology has not provided a clear scientific basis, data, or justification for the expansion of the Permit, and the proposed expansion will not necessarily lead to improved water quality. Environmental stewardship is a core value for each of our ports. Since 2016, our Homeports have spent over \$150 million on environmental projects, including habitat restoration, innovative stormwater treatment, stormwater asset rehabilitation, and shore power initiatives. Should the proposed Permit changes go into effect, the increased cost of compliance will divert public funds from these other programs that have been proven to improve the Salish Sea ecosystem. Additionally, the proposed Permit changes are expected to negatively impact Washington's economy, the cost of goods in our region, and the transportation sector's ability to compete with other regional transportation hubs.

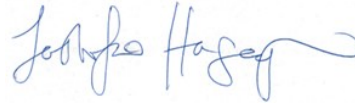
Ecology has a duty to provide clear and implementable regulations based on sound science that demonstrate consideration of reasonable alternatives. Lack of clarity in permit requirements puts Washington businesses at risk of failure, making investments without identifiable benefits, and renders them vulnerable to costly and time-consuming third-party litigation. We recognize the value of clear and implementable regulation in safeguarding our natural environment. Ecology must base changes to the Permit on scientific documentation that justifies these changes, which is simply not present in the draft Permit.

We strongly urge Ecology to consider proposed revisions submitted on behalf of the Port of Seattle, Port of Tacoma, and the Northwest Seaport Alliance.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Kristin Ang', with a long horizontal flourish extending to the right.

Commissioner Kristin Ang  
Co-Chair, Northwest Seaport Alliance  
Port of Tacoma, Commission President

A handwritten signature in blue ink, appearing to read 'Toshiko Hasegawa', with a long horizontal flourish extending to the right.

Commissioner Toshiko Hasegawa  
Acting Co-Chair, Northwest Seaport Alliance  
Port of Seattle, Commission Vice-President