

Appendix A: Response to Comments
On the
Municipal Stormwater Permits
Effective September 1, 2012

National pollutant discharge elimination system (NPDES) and state waste discharge general permit for discharges from large and medium municipal separate stormwater sewers (The 2012 to 2013 Phase I Municipal Stormwater Permit)

NPDES and state waste discharge general permit for discharges from small municipal separate stormwater sewers in western Washington (The 2012 to 2013 Western Washington Phase II Municipal Stormwater Permit)

NPDES and state waste discharge general permit for discharges from small municipal separate stormwater sewers in eastern Washington (The 2012 to 2014 Eastern Washington Phase II Municipal Stormwater Permit)

August 1, 2012

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Introduction

This Response to Comments addresses public comments received on National Pollutant Discharge Elimination System and State Waste Discharge draft permits covering municipal storm sewer systems under Phase I and Phase II municipal stormwater permits. Ecology held a public comment period from October 19, 2011- February 3, 2012 on the following three draft permits:

- 2012-2013 Phase I Municipal Stormwater Permit
- 2012-2013 Western Washington Phase II Municipal Stormwater Permit
- 2012-2013 Eastern Washington Phase II Municipal Stormwater Permit

Ecology considered the comments received during the comment period and provides this Response to Comments for the following final permits (which correspond to the first three draft permits):

Permit:	Effective Dates:	Permit applies to:
The Phase I Municipal Stormwater Permit	September 1, 2012- July 31, 2013	Unincorporated areas of Clark, King, Pierce, and Snohomish counties, as well as the cities of Seattle and Tacoma.
The Western Washington Phase II Municipal Stormwater Permit	September 1, 2012- July 31, 2013	Small municipal separate stormwater sewer systems (MS4s) in western Washington.
The Eastern Washington Phase II Municipal Stormwater Permit	September 1, 2012 - July 31, 2014	Small MS4s in eastern Washington

All three permits regulate stormwater discharges from 45 Secondary Permittees, which are small MS4s that are not cities, towns or counties, and include entities such as ports, school districts, colleges and universities, drainage districts, and state institutions. The two Phase II permits regulate stormwater discharges from 98 cities or towns, and portions of 11 counties.

Ecology has issued a separate Response to Comments for the updated Municipal Stormwater Permits that will be effective through 2018 (Phase I, Western Washington Phase II) and 2019 (Eastern Washington Phase II).

Summary of Permit Development

The Department of Ecology first issued National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge Phase I Permits for municipal stormwater discharges in 1995, and reissued the Phase I Municipal Stormwater General Permit in 2007. Ecology first issued the Eastern and Western Washington Phase II Municipal Stormwater Permits in 2007.

From 2008-2012 Ecology conducted an extensive public process for the reissuance of the Stormwater Permits (refer to Ecology's website for more information). On October 19, 2011, Ecology issued draft permits for public review. Ecology held a public comment period from October 19, 2011 to February 3, 2012. The public comment period included five public hearings statewide to hear oral testimony, with workshops preceding the public hearings to explain and answer questions on the proposed revisions:

- December 5, 2011- Ellensburg
- December 6, 2011 - Spokane Valley
- January 9, 2012 - Lacey
- January 10, 2012 - Vancouver
- January 24, 2012 - Renton

Ecology held three informational public workshops without a public hearing on the draft permits at the following dates, times and locations:

- December 12, 2011 - Walla Walla
- January 30, 2012 - Poulsbo
- January 31, 2012 - Mount Vernon

In April 2012, the Washington State Legislature and Governor enacted Senate Bill 6406 to give cities and counties fiscal relief during periods of economic downturn by delaying or modifying certain regulatory and statutory requirements. For the Phase II permits, Section 313 of the bill modified RCW 90.48.260. The April 2012 legislation directed Ecology to reissue two versions of each Phase II permit, including:

- The Western Washington Phase II permit unmodified from the 2007-2012 permit to be effective through July 31, 2013.
- The Eastern Washington Phase II permit unmodified from the 2007-2012 permit to be effective through July 31, 2014.
- An updated Western Washington Phase II permit to become effective on August 1, 2013.
- An updated Eastern Washington Phase II permit to become effective on August 1, 2014.

Although not required to do so, Ecology also decided to reissue:

- The Phase I permit with minor modifications of the 2007-2012 permit to be effective through July 31, 2013.
- An updated Phase I permit to become effective on August 1, 2013.

On August 1, 2012 Ecology issued all six of the above Permits. The appeal period of all these permits is from August 1, 2012 until August 30, 2012.

Summary of Changes

Phase I Municipal Stormwater Permit

- Ecology reissued the Phase I permit with minimal substantive changes to be consistent with the Phase II legislative direction from 2011 and 2012. Ecology revised the language from the 2007-2012 Phase I Permit to clarify the requirements for ongoing implementation of stormwater management programs that Phase I permittees developed during the 2007 – 2012 permit cycle. Ecology also made revisions to clarify the requirements, that applied during the previous permit term, that do not apply during the permit term beginning on September 1, 2012. For example, Permittees were required to update their ordinances to effectively prohibit non-stormwater, illicit discharges, including spills, into the Permittee's MS4; the reissued permit clarifies that Permittees are not required to complete another ordinance update but that they should continue enforcing these ordinances.

Western Washington Phase II Municipal Stormwater Permit

- Consistent with Chapter 90.48.260 RCW, Ecology made no modifications to the final permit. In response to public comments, Ecology added a table to the textbox at the beginning of the permit to clarify the requirements for ongoing implementation of stormwater management programs. The table also clarifies which of the requirements that applied during the previous permit term do not apply during the permit term that begins on September 1, 2012. For example, although the permit requires permittees to inspect and if needed, clean all known catch basins once during the permit term, the table clarifies the level of effort for one year is 20% of the catch basins in the MS4.

Eastern Washington Phase II Municipal Stormwater Permit

- The final permit is consistent with 2012 legislative changes to Chapter 90.48.260 RCW and will be effective from September 1, 2012 through July 31, 2014. The draft permit proposed a one-year permit term, consistent with direction from 2011 legislation.
- Consistent with legislative direction, Ecology made no modifications to the final permit. In response to public comments, Ecology added a table to the textbox at the beginning of the permit to clarify the requirements for ongoing implementation of stormwater management programs. The table also clarifies which of the requirements that applied during the previous permit term do not apply during the permit term that begins on September 1, 2012. For example, although the permit requires permittees to inspect and maintain 95% of all stormwater treatment and flow control facilities once before the end of the permit term, the table clarifies that the level of effort for the two years is 40% of the facilities.

Organization of the Response to Comments (RTC)

Issues and Responses to Comments:

The table of contents lists the issues for which comments were received, assigns each a number, and lists the section and page in which the summary of and response to comments for each group of issues is located. The issues are numbered by section of the document and sequence, e.g. #1.1 would be Part I, issue number 1.

After the introductory sections, the Response to Comments section is divided into four parts:

- Part I: Contains the summary of the range of comments and response to comments and policy issues related to two or more of the permits.
- Part II: Contains the summary of the range of comments and response to comments related primarily to the Phase I Municipal Stormwater Permit. Sections are cross-referenced to responses under other permits where permit language
- Part III: Contains the summary of the range of comments and response to comments related primarily to Western Washington Phase II Municipal Stormwater Permit. While no comments were submitted specific only to the Eastern Washington Phase II Municipal Stormwater Permit, the response to comments in this section also applies to that permit.

Index of Commenters

At the end of this document is an index that lists the name of each commenter and the issue numbers associated with their comments. The person who signed the comment letter (or e-mail) or provided public testimony is also listed. Where appropriate, an acronym is provided to identify the commenter in Parts I-III of this document.

Part I: Responses to Comments on Issues Common to Two or More Permits

1.1 General Comments

Commenters: Clark County, Pierce County, Washington State University

Summary of range of comments:

- Support extending rather than reissuing the Phase I permit. Would allow further adaptive management, could wait for EPA's new stormwater regulations and audits, and would reduce costs. It is also consistent with legislative intent for Phase II permits.
- It appears that Ecology expects permittees to begin work on 2013 permit requirements before the permit becomes effective.
- Request existing permit be reissued for a longer period of time to address shrinking budgets and staff.

Response to range of comments:

- Ecology reissues the Phase I permit on a schedule consistent with that of the Western Washington Phase II Permit. The schedule for the Western Washington and Eastern Washington Phase II permits was established by 2012 legislation.
- Ecology did not establish new requirements for the 2012 to 2013 permit term in western Washington, or for the 2012 to 2014 permit term in eastern Washington. Ecology clarified the timelines for completing the Phase I monitoring requirements under S8. Minor modifications within the body of the permit clarify the level of effort and deadlines for ongoing implementation of other permit requirements. While Ecology encourages permittees to begin to prepare for the next permit term, it is not required.

Part II: Response to Comments on Phase I Permit

2.1 Clarify requirements in the one-year Phase I permit

Commenters: Snohomish County, King County, City of Seattle, Clark County.

Summary of range of comments

- Fact Sheet language on Ecology expectations for implementation of this permit is not legally binding permit language.
- Language in permit does not reflect the language in the Fact Sheet regarding ongoing implementation and level of effort.

Options for clarifying:

- Ecology should change the language that reads “the effective date of this permit” to “February 16, 2007.” This keeps the schedule for implementation of programs initiated under the 2007 permit consistent in the 1-year permit term (August 2012 to August 2013). This change is needed throughout the permit.
- Ecology should move Fact Sheet statements into the body of the Permit regarding intent to essentially repeat the level of effort for the last year of the permit.
- Revise all the timelines in the permit to reflect Ecology’s expectations.
- Revise all deadlines and timeframes in 2012-2013 permit to ensure final permit language is an extension of the current permit and the only deadline in effect is the requirement for an annual report.

Response to range of comments:

- Ecology revised the timelines and requirements in the permit to clarify ongoing implementation requirements and the requirements that applied during the previous permit term that do not apply to the permit term that begins on September 1, 2012.

2.2 Clarify specific requirements and deadlines

Commenters: Seattle, King County, Snohomish County

Summary of the range of comments:

- S5.A.1; pg. 11; lines 28-30 “No later than 4 years from the effective date of this permit...” This draft Permit will have expired prior to this deadline. Revise or delete this section.
- S5.B; pg. 12; lines 7-10; S5.C.2.b.i; pg. 13; lines 13 & 19; S5.C.2.b.ii; pg. 13; line 24 This draft Permit does not contain “updated” requirements. Additionally, the “implementation schedules” contained in this draft Permit posit a 5 year permit term and thus are not appropriate for a 1 year Permit. Delete this section.
- S5.C.2 Change effective dates impacting Municipal Separate Storm Sewer System Mapping and Documentation sections below:S5.C.2.b.i, S5.C.2.b.ii, S5.C.2.b.iii, S5.C.2.b.iv, S5.C.2.b.v, S5.C.2.b.ii
- S5,C.3 Change effective dates impacting Coordination sections below:S5.C.3.b.i, S5.C.3.b.ii
- S5.C.4 Change effective dates impacting Public Involvement and Participation sections below:S5.C.4.b.i
- S5,C,5- Change effective dates impacting Controlling Runoff from New Development, Redevelopment and Construction Sites sections below:S5.C.5.b.iv, S5.C.5.b.v, S5.C.5.b.vi, S5.C.5. b.vii, S5.C.5.b.viii
- S5.C.6 Change effective dates impacting Structural Stormwater Controls sections below:S5.C.6.b.i

- S5.C.7 Change effective dates impacting Source Control Program for Existing Development sections below: S5.C.7.b.i, S5.C.7.b.ii, S5.C.7.b.iii, S5.C.7.b.iv, S5.C.7.b.v
- S5.C.8 Change effective dates impacting Illicit Connections and Illicit Discharges Detection and Elimination sections below: S5.C.8.b.i, S5.C.8.b.ii, S5.C.8.b.iii, S5.C.8.b.iv, S5.C.8.b.viii
- S5.C.8.b.iv(1) revise to: *Each City covered under this permit shall prioritize conveyances and outfalls and complete field screening for at least 12% of the conveyance systems within the Permittee's incorporated area during the term of this permit.* This clarifies the Permittee's responsibilities during this 1-year permit term and meets the intent of Ecology and the Legislature by maintaining the current level of SWMP effort toward IDDE screening (60% divided by 5 years = 12%).
- S5.C.9 Change effective dates impacting :Operation and Maintenance Program sections below S5.C.9.b.i, S5.C.9.b.ii(1), S5.C.9.b.ii(2), S5.C.9.b.ii(3), S5.C.9.b.ii(4), S5.C.9.b.iii(1), S5.C.9.b.iii(2), S5.C.9.b.iv(1), S5.C.9.b.vi, S5.C.9.b.vii, S5.C.9.b.viii, S5.C.9.b.ix
- S5.C.9.b.i, S5.C.9.b.ii(1) Revise to: *Throughout the term of this Permit, the Permittee shall keep in force ordinances or other enforceable documents requiring maintenance of all permanent stormwater treatment and flow control facilities regulated by the Permittee (including catch basins), in accordance with maintenance standards established under S5.C.9.b.i., above.*
- S5.C.9.b.ii(2) Modify to reflect the reduction in duration of the Permit term from 5 years to 1 year. Require Permittees to inspect no less than 20% of such facilities at least once during the term of this permit to enforce compliance with adopted maintenance standards as needed based on the inspection.
- S5.C.9.b.ii(3) – delete
- S5.C.9.b.iii(3); pg. 30; lines 28- 31 Revise to reflect the fact that this draft Permit now has a 1 year term rather than a 5 year term.
- S5.C.10 Change effective dates impacting Education and Outreach Program sections below: S5.C.10.b.i
- S8.G. Change effective dates impacting Monitoring sections below: S8.G.2.a, S8.G.2.b, S8.G.2.c
- S9.A - Clarify what reports Permittees are required to submit and when.
- S9.E.12 – Permittees already submitted the annual report for calendar year 2010. Delete this provision.

Response to range of comments:

- Ecology agrees that the 2012 to 2013 permit should distinguish between the implementation of ongoing program requirements, deadlines that were met and requirements that were completed during the previous permit term.
- Ecology revised the timelines and requirements in the permit to clarify ongoing implementation requirements and the requirements that applied during the previous permit term that do not apply to the permit term that begins on September 1, 2012.

2.3 S8 Phase I Monitoring Requirements

Commenters: King County, Clark County, Pierce County, Port of Seattle and Port of Tacoma

Summary of range of comments:

- Delete the monitoring requirements (all or part) presented in S8.C.1. Reasons include the cost of continuing and/or completing monitoring programs initiated under the 2007 permits, the fact that the Regional Stormwater Monitoring Program does not continue stormwater discharge monitoring, and data already collected under this program and by stormwater programs throughout the country should be sufficient.
- Define “3 full water years of data” and request that partial water years be considered to determine water year equivalents.

Response to the range of comments:

- Ecology retained the requirement that clarifies when Permittees may cease stormwater discharge monitoring. Ecology believes there is value in having a Western Washington data set made up of equivalent levels of effort for all Phase I Permittees’ flow-weighted composite sampling data. The data set supports Ecology’s work plan for the toxics and nutrients prevention, reduction, and control National Estuary Program grant application (Part A1-Science and Toxics), EPA’s Strategic Plan Goal 2, and directly implements two components (C1.1 and C2) of the Puget Sound Action Agenda: Reduce the Sources of Toxic Chemicals – C1, and Urban Stormwater Runoff – C2. The data set will be used to inform future stormwater discharge permit requirements, regional monitoring programs, municipal stormwater management actions, Toxics Cleanup Program source control strategies, and future TMDL studies. Efforts have begun to compile and evaluate the data set as a whole.
- Ecology agrees Permittees who achieved successful monitoring beginning in the midst of a water year should be able to combine the data from that partial water year with a later partial water year, and has deleted the reference to “water” year in this requirement.
- Three complete years of data will be determined based on an evaluation of permit-specified minimum performance measures in S8.D.2.a over a given period. Ecology expects Permittees to document: forecasted qualifying storms, actual qualifying storms, storms sampled, and storms analyzed. Permittees must also submit documentation of good faith efforts with good professional practice where the Permittee is not able to collect a successful sample for the full number of qualifying storms.

2.4 Substantive revisions of permit requirements

Commenter: Snohomish County

Summary of range of comments

- S2 Authorized Discharges - Disagree with combining the authority of Chapter 90.48 RCW with a Clean Water Act NPDES permit. The NPDES permit should regulate to discharges to surface waters only, not discharges to ground water. Ecology should issue a separate permit for discharges regulated under state law.
- S5.C.2 Mapping
 - S5.C.2.b.ii - Delete “land uses” from the attributes to be mapped, as it is not part of the MS4 and a proper subject for mapping.
 - S5.C.2.b.iv - Requirement to map existing known connections over 8 inches:
 - Clarify confusing language by adding “owned or operated by the Permittee.”
 - Delete “existing” and “known,” as the Permittee cannot map non-existing and unknown parts of the system.
 - Delete “or equivalent cross-section area” as not indicative of volume of stormwater for ditches, and reduce emphasis on rural system mapping so Permittee can set priorities where volumes are high. This section should be re-worded to refer to “tributary conveyances over 8 inches...that flow either to pipe outfalls having a 24” nominal diameter or larger or to open channel outfalls for which the tributary conveyance contains a pipe with minimum nominal diameter of 24 inches...”
- S5.C.8.b.iv – Requirement to train municipal field staff to report illicit discharges is unduly burdensome and unlikely to be ineffective, as well as intrusive. It would mandate water pollution control training for all County employees who work in the field. Suggest a more targeted approach. Delete the requirement to document details of training.
- S5.C.9.b.vii – Delete or clarify requirement to control pollutants on lands owned or maintained by the Permittee since Ecology permit does not cover stormwater that does not enter the MS4. Replace “maintained” with “operated” or add definition for this. Also, Ecology has no authority to dictate what land constitutes real property “owned” by the County.
- S5.C.9.b.viii – Clarify this requirement, as the word “could” is unbounded, and the training topics may not be relevant to all job functions identified. Suggest more targeted approach. Reduce detail on frequency and documentation, which can be determined by the County as long as it meets substantive requirements of MEP and AKART.

Response to range of comments

- Ecology will not issue a separate state discharge permit for compliance with Chapter 90.48 RCW. This Phase I permit has been in place for five years, and a previous permit was in place from 1995 to 2007 under the same construct of addressing both federal and state law. Issuing two permits to cover the same discharges would be inefficient, confusing, and inconsistent with WAC 173-220-170.
- Ecology reissued the Phase I permit with minimal changes to be consistent with the Phase II legislative direction from 2011 and 2012. For this reason, Ecology did not consider the substantive changes recommended by the commenter in the Response to Comments for this permit. However, as requested by the commenter, Ecology considered them to also

be comments on the draft 2013-2018 permit and provided a response in the Response to Comments for that permit.

Part III: Response to Comments on Western Washington Phase II Permit

3.1 Clarify the requirements of the one-year permit.

Commenters: City of Auburn, City of Bellevue, City of Bothell, City of Edmonds, City of Everett, City of Kenmore, City of Kent, Kitsap County, City of Longview, City of Marysville, City of Port Orchard, City of Poulsbo, City of Redmond, Regional Road Maintenance Forum, City of SeaTac, City of Sedro Woolley, City of Shoreline, City of Sumner

Summary of the range of comments:

The one-year permit should clarify requirements, including deadlines, for the one-year permit term for the following reasons:

- Not to do so puts permittees at risk of violating the permit.
- It is unclear what constitutes compliance and is confusing to implement.
- Retaining the existing language requires some tasks to be re-done, and others to be done at unachievable levels of effort. For example, the current language requires completion in one year of requirements written for a five year timeframe.

Suggestions for clarification:

- Revise the requirements and deadlines to clarify what constitutes compliance.
- Clarify that this permit is a continuation or extension of the previous permit and none of the deadlines except the annual report requirements are in effect.
- The addendum should note that the timelines in the permit no longer apply, and explicitly list which programs must be continued.
- Ecology should issue clear guidance on implementation of the one-year permit.
- Remove all deadlines in the permit and include statement that “all activities herein were accomplished under the previous permit term. The purpose of this permit is to legally require that permittees continue to implement those activities until the new permit goes into effect in 2013.”

Response to range of comments

- Ecology agrees that the 2012 to 2013 permit should clarify the level of effort for ongoing program implementation, and should address deadlines that were met and requirements that were completed during the previous permit term. Ecology added a table at the beginning of the permit (as well as for the two-year Eastern Washington Phase II Permit) with clarifications of requirements referenced to the permit conditions to which they apply.

3.2 Clarify specific requirements and deadlines

Commenters: City of Auburn, City of Bellevue, City of Bothell, City of Edmonds, City of Everett, City of Kenmore, City of Longview, City of Port Orchard, City of Poulsbo, City of Redmond, City of Sedro Woolley, City of Sumner

Summary of range of comments

- Deadlines that should be clarified are:
 - S5.C - Develop and implement the SWMP within 180 days prior to permit expiration date.
 - S5.C.1 – All public education activities are required more than one year from the effective date of the permit, so none would occur.
 - S5.C.2.a – Create public involvement opportunities within one year of permit effective date.
 - S5.C.3 – Full implementation of the IDDE program no later than 180 days before expiration date.
 - S5.C.3.d – Distribute IDDE information to public no later than 180 days before expiration date.
 - S5.C.4 – Only recordkeeping (S5.C.4.d) is required in the one year permit term.
 - S5.C.5.d – Requirement to inspect and if needed clean all catch basins once during the permit term. However, S5.C.5 states that the O&M program is not required to be implemented until three years after the permit effective date.
 - S5.C.5.e - The MS4 system 95% inspection compliance standard for sections b, d, and e.
 - S9 – Reporting for first year annual report will be from effective date until December 31, 2012.
 - G18 Duty to Reapply – Jurisdictions have already met the requirement for 2013 to 2018 permit term.
- Clarify permittee responsibilities under S19.B.2. Are jurisdictions required to re-submit authorization to delegate certification signature to an authorized representative?

Response to range of comments:

- Ecology clarified each of the requirements listed in the table at the beginning of the one-year permit (and at the beginning of the two-year Eastern Washington Phase II Permit).
- Ecology clarified that permittees are not required to submit new letters of authorization to delegate authority under G19. Individuals or positions with authorization delegated by a principal executive officer or ranking elected official during the previous (2007-2012) permit term retain the designation of a “duly authorized representative” under G19.B during the subsequent permit term.

Index of Commenters

Commenter Name	Signatory	Issue Number
City of Auburn	Dennis R. Dowdy PE	Part III - 3.1, 3.2

City of Bellevue	Nav Otal	Part III - 3.1, 3.2
City of Bothell	Don Fiene, PE	Part III - 3.1, 3.2
City of Edmonds	Phil Williams	Part III - 3.1, 3.2
City of Everett	Heather Kibbey	Part III - 3.1, 3.2
City of Kenmore	Richard Sawyer	Part III - 3.1, 3.2
City of Kent	Tim LaPorte, PE	Part III - 3.1
City of Longview	Josh Johnson, PE	Part III - 3.1, 3.2
City of Marysville	Kevin Nielsen	Part III - 3.1
City of Port Orchard	Andrea Archer, PE	Part III - 3.1, 3.2
City of Poulsbo	Anya Funk	Part III - 3.1, 3.2
City of Redmond	William J. Campbell, PE	Part III - 3.1, 3.2
City of SeaTac	Don Robinett	Part III - 3.1
City of Seattle	Nancy Ahern	Part II - 2.1, 2.2.
City of Sedro Woolley	David Lee, PE	Part III - 3.1, 3.2
City of Shoreline	Mark Relph	Part III - 3.1
City of Sumner	Donelle M. Nicaise	Part III - 3.1, 3.2
Clark County	Marc Boldt	Part I - 1.1. Part II - 2.1, 2.3
King County	Mark Isaacson	Part II - 2.1, 2.2, 2.3
Kitsap County	Christopher W. May	Part III - 3.1
Pierce County	Dan D. Wrye	Part I - 1.1. Part II - 2.3
Port of Seattle	Marilyn Guthrie	Part II - 2.3
Port of Tacoma	Jason Jordan	Part II - 2.3
Regional Road Maintenance Forum	Jeff Rudolph	Part III - 3.1
Snohomish County	Bree Urban	Part II - 2.1, 2.2, 2.4
Washington State University Pullman	Gene Patterson	Part I- 1.1