

The Boeing Company continues to seek a workable stormwater program in which:

1. Results are measurable
2. Actions are based on sound science
3. Requirements are consistent with technology reasonably available.

Boeing provides the following proposal to Ecology and other stakeholders in the storm water arena.

1. Adopt the Puget Sound Partnership approach to determine the value of an action by linking it to measurable results. Thus, permit benchmarks will need to be considered in context of their impact on the receiving water. This will require that the monitoring requirements be adapted to provide a holistic view of storm water discharges.
2. Initiate a stakeholder process similar to that used in resolving the “boat yard permit” to determine what is needed to develop meaningful data to measure the effectiveness of the storm water permit provisions. These provisions will be incorporated into the new permit.
3. Ecology accept responsibility for identifying the best management practices to be used to treat for the materials listed in the permit. Ecology has already effectively made this commitment by issuing the East and West side storm water technical manuals. Ecology has also, in conformance with the adaptive management provisions of SB 6514, acknowledged that narrative water quality standards and AKART (All Known and Reasonable Treatment) are satisfied with execution of the BMPs identified. Ecology’s efforts in developing these BMPs from engineered natural treatment to high density urban mitigations are a corner stone to a successful storm water program.
4. Business, Non-governmental organizations, government entities and other entities agree to a minimum of a one year extension of the current permit to allow time for the stakeholder process to take place.

The entire Washington State community needs to take this opportunity to step back from another round of appeals that provide nothing to actually improving the environment. An approach based on consensus can lead to improvement in our waters while providing permittees with reasonable means to comply with simplified permits. Knowing that actions being taken will actually have a positive impact provides a psychological boost for permittees to comply-something missing from the current program. It also provides a degree of certainty to the citizens that the measures being taken are worth the cost in taxes / fees and that government is wisely employing the citizen’s limited resources. Both these are important elements in developing public support for any effort to remove pollutants and restore endangered wildlife to our lakes, streams and bays such as the Puget Sound Partnership.

Attachment 1: Recommendation to create a results based program