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July 15, 2009

Mr. Jeff Killelea
Dept. of Ecology
P.O. Box 47600
Lacey, WA 98504-7600
JKIL461@ecy.wa.gov
Industrialstormwatercomments@ecy.wa.gov

Via email

RE: Columbia Riverkeeper Supplemental Comment on Draft Washington Industrial General Stormwater Permit.

Dear Mr. Killelea:

On behalf of Columbia Riverkeeper (Riverkeeper), please accept these comments on the Draft Industrial General Stormwater Permit (Draft IGSP). In addition to these comments, CRK submitted detailed comments in coalition with the Puget Soundkeeper Alliance and Spokane Riverkeeper (“Coalition Comments”). As the Coalition Comments state, Riverkeeper is deeply disappointed in Department of Ecology’s (Ecology) Draft IGSP. The purpose of Riverkeeper’s individual comment is twofold. First, this comment highlights the pollution threats facing the Columbia River and the pivotal role industrial stormwater regulation plays in improving water quality. Second, Riverkeeper respectfully requests that Ecology revise the draft IGSP and issue a permit that adheres to the goals and intent of the Clean Water Act: to reduce water pollution and protect beneficial uses.

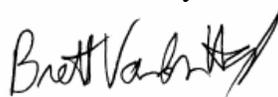
Columbia Riverkeeper's mission is to restore and protect the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Riverkeeper is a membership-based, non-profit organization with members who live, recreate, and work throughout the Columbia River basin, including near and downstream of hundreds of industrial facilities that discharge pollution under the Draft IGSP. Riverkeeper’s members swim in the Columbia, eat fish caught from the river, and enjoy multiple recreational and commercial activities on and around the River.

Threats facing the Columbia River are severe by any measure. *See Columbia River Basin State of River Report for Toxics*, Environmental Protection Agency, Region 10 (January 2009), available online at: <http://yosemite.epa.gov/r10/ecocomm.nsf/Columbia/SoRR/>. To address the leading cause of water quality impairment, Riverkeeper invests significant time and resources in reducing pollutant loads from municipal, industrial, and construction stormwater sources. According to the National Research Council, “[s]tormwater runoff from the built environment remains one of the great challenges of water pollution control, as this source of contamination is a *principal contributor* to water quality impairment of waterbodies nationwide.” *Urban Stormwater Management in the United States*, National Research Council (Oct. 15, 2008), available online at: http://www.epa.gov/npdes/pubs/nrc_stormwaterreport.pdf (emphasis added).

Stormwater pollution is a public health issue with particular impacts on low income residents that regularly use the Columbia and other local waterbodies as a food source for their families. Riverkeeper fails to understand Ecology’s proposal to issue permits that allow more pollution to enter an impaired system with multiple endangered fish and a large population of fish consumers. For example, Riverkeeper asks that Ecology reconsider and eliminate plans to apply dilution factors that effectively authorize industrial facilities to contribute *more* pollution to the Columbia River and its tributaries. Given the public health implications of industrial stormwater pollutants in the Columbia, Ecology’s proposal undermines public and private sector efforts to improve water quality and recover endangered salmon and steelhead runs. State and federal law require Ecology to issue a permit that does not backslide from the requirements of the previous permit. Moreover, the federal Clean Water Act expressly requires Ecology to issue new permits that ratchet down the levels of permissible pollution. Simply put, the Draft IGSP violates the letter of the law and ignores Ecology’s duty to protect human health.

Riverkeeper respectfully requests that Ecology carefully consider and respond to the Coalition Comments. There are fundamental problems with this permit that Ecology must fix. As a public interest organization committed to improving water quality, Riverkeeper finds Ecology’s Draft IGSP deeply troubling and worthy of public attention.

Sincerely,



Brett VandenHeuvel
Executive Director
Columbia Riverkeeper