



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

June 18, 2014

Jeff Killelea
Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

RE: WDFW Comments on Ecology's Draft Industrial Stormwater General Permit

Dear Mr. Killelea:

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review Ecology's proposed revisions to the Industrial Stormwater General Permit. We have reviewed the proposed revision through the lens of WDFW's mission: preserving, protecting and perpetuating fish, wildlife and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. We support the proposed changes and have one suggested modification.

Suggested modification

The definition of *Control Plan* includes, "...restrictions for the protection of endangered species...". We suggest you broaden this by inserting the words "state or federal threatened or" before the word "endangered." This would have the effect of requiring facilities to abide by recovery plans prepared for state and federal threatened and endangered species.

Support

Puget Sound Sediment Cleanup Sites: We note the proposal included provisions that would improve protection for Washington's fish and wildlife resources by requiring higher discharge standards for select industries discharging to impaired waterbodies and to Puget Sound Sediment Cleanup Sites. Reducing sediment discharges containing toxic substances such as polycyclic aromatic hydrocarbons (PAHs), zinc, copper and other metals is important for aquatic species. Toxic substances in sediments impact the lower trophic levels of the food web which results in accumulation at higher levels; they can also negatively impact salmon and other fishes, especially in embryonic stages. Bioaccumulation of toxic substances negatively impacts aquatic biodiversity and can interfere with citizens' recreational and commercial harvest opportunities. We support your proposed requirements to prevent potentially toxic-laden sediments from

reaching marine waters through enhanced maintenance of stormwater facilities and additional sampling.

Other: We support other changes in the proposed permit, including:

- Making permitting and reporting more streamlined/less burdensome for permittees.
- Simplifying monitoring requirements without decreasing standards.
- Requiring Stormwater Pollution Prevention Plans use the 2012 *Stormwater Management Manual* in Western Washington instead of the earlier 2005 edition.

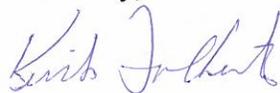
We note that the reissuance continues to protect Washington's fish and wildlife resources by:

- Continuing to include in your definition of "pollution" discharges that are likely to be harmful to "wild animals, birds, fish, or other aquatic life."
- Continuing to require monitoring and apply adaptive management; we support your use of benchmarks for turbidity, zinc, copper, pH, and oil sheen.

We appreciate Ecology's efforts to ensure that discharges of stormwater from the state's approximately 12,000 industrial facilities provide for the needs of fish, wildlife, and habitat while contributing to the state's economic vitality.

If you have any questions regarding this, please contact me at (360) 902-2390 or keith.folkerts@dfw.wa.gov.

Sincerely,



Keith Folkerts

cc: Margen Carlson, Tim Quinn, PhD, Lynette Wickett