



April 30, 2009

Municipal Permit Comments
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

RE: Proposed Permit Modifications for the National Pollutant Discharge Elimination System (NPDES) Stormwater Permits.

The Port of Tacoma (the Port) would like to submit the following comments for the proposed permit modifications for the NPDES and State Waste Discharge Permit for Discharges from Large and Medium Municipal Separate Storm Sewers (Phase I Permit)

Comment 1:

The Port suggests the following modification in Section S6.E.7, third sentence, page 41 of 74 to read:

SWPPP(s) shall be prepared and implemented for all Port-owned lands, except environmental mitigation sites and facilities that are required to have coverage under the General NPDES Permit for Stormwater Discharges Associated with Industrial Activities or another NPDES permit that covers stormwater discharges associated with the activity.

The Port believes the above suggested verbiage is consistent with the Ecology's modified Section S5.9.b.xi, page 26 of 74

Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this permit, that are not required to have coverage under the General NPDES Permit for Stormwater Discharges Associated with Industrial Activities or another NPDES permit that covers stormwater discharges associated with the activity.

Comment 2:

The Port would like to clarified the “,except environmental mitigation sites “ addition in Section S6.E.7 covers all habitat sites that have been, or to be, developed through both Port's regulatory mitigation obligations and voluntary conservation effort.

Comment 3:

Section S9.E.10, page 57 of 74

As a proponent for feasible Low Impact Development applications in industrial setting, the Port supports Ecology's logical approach and incremental implementation of actions. The Port suggests that Ecology and the LID Technical Workgroup develop a checklist that clearly defines and comprehensively lists all barriers to LID to assist Permittees in development and redevelopment planning.

Comment 4:

The Port appreciates Ecology's recognition of the difficult financial situation municipalities are facing, including the Port and its tenants. We commend the Ecology in its efforts to help alleviate some of the financial burden by asking Permittees to provide input on cost reducing ideas. The Port of Tacoma would like to submit the following suggestion:

1. Make full implementation of the Stormwater Management Plan due on April 12, 2011. That will give the Port another full year to comply with this requirement. This will allow us to spread the associated costs over another year, and to do the work in-house rather than have to hire consultants or other staff to do the work. Similarly, providing another year for full implementation of our Operation and Maintenance program will provide cost savings and a better program.
2. Delay toxicity sampling for outfall monitoring for at least one year.

Neither of these delays in due dates will result in violations of the Water Quality Standards but will provide some financial relief to the Port and its tenants.

If you have questions regarding the above comments, please contact Lisa Rozmyn at (253) 592-6793.

Sincerely,



Sue Mauermann
Director, Environmental Programs

Cc: Kurt Fremont, Washington Department of Ecology
Lisa Rozmyn, Port of Tacoma
Cindy Lin, Port of Tacoma