NO. 102445-2

SUPREME COURT OF THE STATE OF WASHINGTON

PUGET SOUNDKEEPER ALLIANCE,

Petitioner,

v.

WASHINGTON STATE DEPARTMENT OF ECOLOGY; SNOHOMISH COUNTY, CITY OF SEATTLE, CITY OF TACOMA, PIERCE COUNTY, CITY OF BELLEVUE, KING COUNTY; and WASHINGTON POLLUTION CONTROL HEARINGS BOARD,

Respondents.

RESPONDENT DEPARTMENT OF ECOLOGY'S ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

The Court of Appeals properly affirmed a decision by the Pollution Control Hearings Board that upheld the municipal stormwater permits at issue in this case. The permits protect water quality by including conditions to implement applicable federal and state water pollution control requirements. The Court of Appeals decision is not inconsistent with any published Court of Appeals decision because, consistent with its precedent, the Court below properly concluded the permits comply with state water pollution control requirements for the sources of pollution regulated by the permits.

Puget Soundkeeper Alliance (Soundkeeper) fails to cite any evidence in the record to support its allegation that the municipal stormwater permits authorize discharges that cause or contribute to violations of water quality standards. In fact, the challenged permits explicitly do not authorize discharges that violate water quality standards and include detailed requirements for the development of stormwater management

programs to protect water quality. Consistent with Washington's water quality standards, where a violation of a water quality standard occurs even after application of the required stormwater management program, the permits also include a condition that allows the Department of Ecology to require additional practices to control municipal stormwater discharges. While Soundkeeper may disagree with the way Ecology has implemented this condition, that disagreement is a challenge to permit implementation, not a proper challenge to the terms and conditions in the permits.

Soundkeeper waived the argument that the permits are allegedly "self-regulating" by not raising it below. The argument lacks merit even if it had been raised below.

The Court should deny the Petition for Review because the decision below is not in conflict with a published decision of the Court of Appeals and this case does not involve an issue of substantial public interest that should be decided by this Court.

II. STATEMENT OF THE ISSUES

1. Whether the Court of Appeals correctly concluded that the pollution control requirements in the Phase I and Phase II Western Washington Municipal Stormwater General Permits (Permits) meet the requirement that wastes discharged to waters of the state use all known, available, and reasonable methods to control pollution.

2. Whether the Court of Appeals properly concluded that the Permits do not authorize discharges that violate water quality standards.

III. STATEMENT OF THE CASE

A. Regulation of Municipal Stormwater Discharges

1. Municipal stormwater is difficult to manage

This case involves municipal stormwater general permits issued by Ecology to municipalities throughout Western Washington. The permit issued to large and medium municipalities, known as the Phase I Permit, covers Seattle,

Tacoma, King County, Pierce County, Snohomish County, and Clark County. The permit issued to small municipalities, known as the Phase II Western Washington Permit covers a number of cities and counties, including Bellevue, Everett, Thurston County, and others.[1]

The Permits regulate discharges from the covered entities' municipal separate storm sewer systems, known as MS4s. *See* 40 C.F.R. § 122.26(a)(3). MS4s are the system or systems of conveyance throughout a municipality that convey stormwater, including streets, catch basins, curbs, gutters, ditches, and storm drains. *See* 40 C.F.R. § 122.26(b)(8); AR 2038. Rain falling on streets, roofs, parking lots, and other impervious surfaces picks up pollutants as it flows into the MS4

[1] There are two Phase II permits—one for Western Washington and one for Eastern Washington. The Eastern Washington permit was not appealed and is not at issue. A complete list of Phase I and Phase II permittees can be found on Ecology's website at: Municipal stormwater general permits - Washington State Department of Ecology (last visited Oct. 27, 2023).

and is then discharged from a variety of outfalls and discharge points into nearby waterbodies. Municipalities, especially larger ones like King County and the City of Seattle, may have hundreds or even thousands of MS4 discharge points. *See*, *e.g.*, AR 819 (King County has 2,440 mapped outfalls), AR 836 (Tacoma has approximately 251 outfalls and discharge points), AR 846 (Snohomish County has over 2,200 discharge points), AR 862 (Seattle has approximately 295 storm drain outfalls), AR 1757 (Pierce County has approximately 17,500 outfalls and discharge points).

As the Board recognized in 2008, controlling municipal stormwater discharges is difficult because of the size of the systems involved, the variety of pollutants that may be present, and the inability of the municipality to effectively control the sources of pollution. *See* Respondent Department of Ecology's Brief, App. B at 23–25 (FF 27–29), *Puget Soundkeeper All. v. Dep't of Ecology,* No. 84492-0-I (Wash. Ct. App. Sept. 5, 2023) (Ecology's Br.) (*Puget Soundkeeper All. v. Dep't of Ecology,*

PCHB Nos. 07-021–023, -026–030, -037 (Aug. 7, 2008) (Findings of Fact, Conclusions of Law and Order (Condition S4))). The sources of stormwater pollution include the lawful daily activities of ordinary citizens, such as driving cars, fertilizing lawns, or conducting a business. AR 2039–40. Control of municipal stormwater is a "long-term challenge." *See* AR 847 ("improving municipal stormwater is a long-term challenge"), AR 864 ("long-term, societal challenge").

2. The Clean Water Act treats municipal stormwater differently from other discharges

Because of these difficulties, the Clean Water Act treats municipal stormwater differently from other discharges. Under the Act, a discharge of pollutants from a point source to a water of the United States requires a permit, known as a National Pollutant Discharge Elimination System (NPDES) permit. In Washington, Ecology has been delegated complete authority to administer the NPDES permit program. RCW 90.48.260. Washington's Water Pollution Control Act also prohibits the

discharge of pollutants to state waters without a permit. RCW 90.48.080.

The Clean Water Act requires states to develop state water quality standards, which may include both numeric standards and narrative standards. *See* 33 U.S.C. § 1313(a)(3). Water quality standards take into account the beneficial uses of a waterbody, the maximum concentration of pollutants that may be present in the water, and protection of the existing quality of the water. *Am. Paper Inst., Inc. v. U.S. E.P.A.*, 996 F.2d 346, 349 (1993). Washington's water quality standards are found in WAC 173-201A.

As a general rule, NPDES permits issued by the state must contain effluent limitations adequate to ensure that the permitted discharge does not cause or contribute to a violation of state water quality standards. 33 U.S.C. § 1311(b)(1)(C). Effluent limitations may be either technology based or water quality based. *See generally,* 40 C.F.R. § 122.44. In Washington, NPDES permits must require the use of "all

known available and reasonable methods . . . to prevent and control . . . pollution" (AKART), which is a technology based standard. *See* RCW 90.48.010; AR 1630. If, after application of this standard, the discharge still has a reasonable potential to cause or contribute to a violation of water quality standards, a water quality based effluent limit may be required. 40 C.F.R. § 122.44(d)(1)(3).

The Clean Water Act treats municipal stormwater discharges differently from other discharges regulated under the NPDES program. AR 1628, 2042. The Act requires municipalities to reduce pollutants in their stormwater to the maximum extent practicable (MEP). 33 U.S.C. § 1342(p)(3)(B)(iii). This means that, under federal law, municipal stormwater discharges do not have to comply with state water quality standards. *Def. of Wildlife v. Browner*, 191 F.3d 1159, 1164–66 (9th Cir. 1999); *see* Ecology's Br., App. C at 17–19 (*Puget Soundkeeper All. v. Dep't of Ecology*, PCHB

Nos. 07-021–023, -026–030, -037 (April 2, 2008) (Order on Dispositive Motions: Condition S4)).

Rather than containing effluent limits to ensure compliance with water quality standards, under the Clean Water Act, municipalities adopt a program to reduce pollutants to the maximum extent practicable. *See* 40 C.F.R. §§ 122.26(d)(2)(iv), 122.34(a); AR 1628. Federal regulations spell out in general terms the elements required to be in the program for both Phase I and Phase II jurisdictions. 40 C.F.R. §§ 122.26(d) (Phase I Permit), 122.34(b) (Phase II Permit). In Washington, the programs must be sufficient to satisfy both the federal MEP standard and the state AKART standard. *Snohomish Cnty. v. Pollution Control Hearings Bd.*, 187 Wn.2d 346, 352, 386 P.3d 1064 (2016).

The Ninth Circuit in *Defenders of Wildlife v. Browner* specifically considered whether NPDES permits issued to municipalities for stormwater discharges were required by 33 U.S.C. § 1311(b)(1)(C) to include effluent limits sufficient

to ensure that the discharges did not cause or contribute to a violation of water quality standards. The court held they were not required to do so. The court held that the MEP standard in 33 U.S.C. § 1342(p)(3)(B)(iii) replaced the standard in 33 U.S.C. § 1311 such that municipal stormwater permits were only required to control pollutants to the maximum extent practicable. *Browner,* 191 F.3d at 1165. The court further held that, while EPA had discretion to require such discharges to comply with standards, it had not done so, and instead had chosen to rely on best management practices for control of stormwater pollution. *Id*. at 1166–67. However, under Washington's Water Pollution Control Act, municipal stormwater permits must be conditioned so that authorized discharges do not violate Washington's water quality standards. Ecology's Br., App. C at 23–28.

B. Washington's Municipal Stormwater Permits

1. The heart of the Permits is Condition S5—The Stormwater Management Program

As noted above, Ecology is responsible for developing and issuing municipal stormwater permits in Washington. The heart of the Permits at issue here is Condition S5. AR 2055. That condition requires covered municipalities to adopt a stormwater management program that contains a variety of detailed elements to reduce the discharge of pollutants to the MEP, meet state AKART requirements, and protect water quality. AR 890. The elements of the programs differ depending on the size of the municipality. The larger jurisdictions covered by the Phase I Permit generally have more requirements than the smaller jurisdictions covered by the Phase II Permit. AR 2041; *see also Puget Soundkeeper All. v. Dep't of Ecology,* PCHB Nos. 07-022, -023 (Feb. 2, 2009) (Findings of Fact, Conclusions of Law and Order) (discussing the differences between Phase I and II jurisdictions).

The elements of the stormwater management program required by Condition S5 of the Phase I Permit include an illicit discharge detection and elimination program, a source control program for existing development, a requirement to control runoff from new development and redevelopment, including use of low impact development techniques, a structural retrofit requirement for existing development, a mapping requirement, stormwater management action planning, an operation and maintenance program, and an education and outreach program. AR 890–915. Each of these elements contain many sub-elements and performance measures.

The Phase II Permit contains many of the same elements, but does not include a structural retrofit requirement for existing development, although it does include a planning requirement to consider and determine when and where structural retrofits may be needed (in addition to other actions). *See* AR 1269–91.

The Stormwater Management Program required by Condition S5 establishes the actions and activities designed to protect water quality and reduce the discharge of pollutants to meet the federal MEP and state AKART requirements. AR 2055.

2. Condition S4 addresses a narrow set of circumstances

Condition S4 of the Permits, which Soundkeeper focuses on here, was developed by Ecology to supplement Condition S5. *See* AR 2055–56. It addresses a narrow set of circumstances where a permittee, despite implementation of the stormwater management program required by Condition S5, becomes aware of credible, site specific information that a specific MS4 discharge is causing or contributing to a violation of water quality standards. *Id.*

Under Condition S4, permittees who become aware of such information must file a report with Ecology. Ecology may then direct the permittee to take corrective action, or Ecology may determine that no additional action is needed because the

violation will be addressed through implementation of other permit requirements. Permittees who comply with Condition S4 are deemed in compliance with the permit notwithstanding a violation of standards. *See* AR 888–90 (Phase I Permit), AR 1267–69 (Phase II Permit). The condition represents an iterative, adaptive management approach to addressing compliance with standards in specific circumstances where a known violation is occurring. *See* AR 632, 1638. This iterative, adaptive management approach is consistent with Washington's water quality standards regarding stormwater pollution. WAC 173-201A-510(3)(b).

Ecology "presumes that the stormwater management program in Condition S5 and the other provisions of the Permit will ensure that municipal stormwater discharges meet water quality standards, [but] there may be individual instances where credible, site-specific information shows that a violation is occurring. Condition S4 addresses those situations." AR 608.

C. The Board Affirmed, and Partially Revised, Condition S4 in 2008

In Washington, Ecology has issued four rounds of municipal stormwater permits.[2] The first round was issued in 1995, the second round in 2007, the third round in 2013 and 2014, and the current round in 2019. *See* AR 1609–10, 1908, 1925, 2041. The permits issued in 2007 were appealed by both Soundkeeper and the permittees and were extensively litigated. The Board held separate hearings in 2008 regarding Condition S4, the Phase I Permit, and the Phase II Permit.

The Board affirmed Condition S4 (with some modifications), holding that it represented a valid exercise of Ecology's discretion to determine the manner, method, and timing of compliance with water quality standards. Ecology's Br., App. B at 47–49 (CL 26–27). The Board concluded that the Condition was "a reasonable approach . . . by recognizing [that] compliance with all aspects of state water quality standards, at

[2] NPDES permits generally must be reissued every 5 years.

every site or outfall at all times, cannot be met at this time, but also by not providing a categorical exemption from complying with water quality standards." *Id.* at 48 (CL 26).

Following the Ninth Circuit's decision in *Browner*, the Board held on summary judgment that the Clean Water Act did not require the permits to include effluent limits sufficient to meet state water quality standards. *Id.* App. C at 17–18. The Board rejected Soundkeeper's argument that EPA had exercised its discretion to require such compliance. The Board found that EPA's Phase I and Phase II stormwater rules did not include any such requirement and that the general NPDES rules did not apply. *Id*. App. C at 18.

The Board held, however, that municipal stormwater discharges were nevertheless required to comply with standards under state law. The Board concluded that, unlike federal law, state law did not make any distinction between municipal stormwater discharges and other discharges, which generally must meet standards. *Id.* at 26–27. The Board held that various

state statutes and regulations, including RCW 90.48.160, 90.48.520, 90.54.020, and WAC 173-226-070, required municipal stormwater discharges to meet state water quality standards. Ecology's Br., App. C at 26–30.

Nonetheless, because of the difficulties inherent in municipal stormwater management, the Board recognized that municipalities could not reasonably be expected to meet state water quality standards at all times and in all places. *Id.* at 25–26 (FF 31–32). The Board therefore held that, based on its prior cases, Ecology had the discretion to "define the manner, method and timing for requiring compliance with these standards." *Id.* App. C at 30. The Board determined that "Ecology has considerable leeway in defining permit terms that will effect compliance over the short and long-term, discretion to fashion enforcement methods, ability to define the manner in which compliance schedules should be utilized, and powers to define, through permit terms, the ongoing iterative process necessary to achieve ultimate compliance with water quality

standards." *Id*. at 30–31. The Board's 2008 decision on this point was not appealed by any of the multiple parties to the case.

Subsequently, after hearing testimony regarding Condition S4, the Board upheld it, with some modifications, as a valid exercise of Ecology's discretion. Ecology's Br., App. B at 48–49 (CL 27). The Board rejected Soundkeeper's argument that the condition was improper because it failed to establish a timeframe or specific due date to achieve compliance with standards. Compliance with standards, the Board held, would be achieved over time on a jurisdiction-wide basis by implementation of the programmatic elements of the Permit, while Condition S4 would address those limited circumstances where known violations occurred despite implementation of the stormwater program. *Id.* at 37–40 (CL 13–16); *see also* AR 2057. The Board held that Condition S4.F properly relied on best management practices and adaptive management to

achieve compliance. Ecology's Br., App. B at 37–40 (CL 13–16) (citing WAC 173-201A-510).

In addition, the Board found that it would take many years and multiple permit terms to achieve ultimate compliance with water quality standards. *Id.* App. B at 25–26 (FF 31–32). The Board's final decision was not appealed.

D. The Board's 2019 Decision Rejecting Soundkeeper's Renewed Challenge To Condition S4

Condition S4 has remained basically unchanged in the Permits since the Board upheld it in 2008.[3] In this case, Soundkeeper appealed the Permits and challenged Condition S4 along with several other Permit terms. The parties settled most of the issues. AR 2034.

With regard to Condition S4, the Board rejected Soundkeeper's arguments on summary judgment. *See* AR 2054–72. The Board held that the fact that urban streams remain impaired did not show either that the impairment was

[3] In 2013, the Permittees appealed the Permits but no party challenged Condition S4 at that time. *See* AR 2049.

caused by MS4 discharges or that the Permits failed to ensure compliance with water quality standards. AR 2066. The Board further held that "[t]he long-term water quality problems and associated salmon pre-spawn mortality resulting from pollutants in stormwater are not problems which Condition S4 was designed to address." *Id.* Rather, those problems would be addressed over the long term through Condition S5 and the rest of the Permits. The Board concluded that Condition S4 "remains a valid exercise of Ecology's discretion to define manner, method, and timing, to secure compliance with water quality standards" and that Soundkeeper had failed to show that Ecology's exercise of that discretion was unlawful. AR 2068.

Finally, the Board rejected Soundkeeper's argument that Ecology had failed to properly evaluate the Permits for compliance with state and federal law. AR 2068–72. The Board held there was no legal requirement for Ecology to evaluate each condition of the Permits separately from the whole, because the Permits are programmatic in nature. AR 2069. The

Board also noted that the Permits have become stricter over time, consistent with the requirements of the Clean Water Act. AR 2070–71.

Soundkeeper appealed the Board's decision and the Court of Appeals issued an Unpublished Opinion that affirmed the Board's decision affirming the Permits. *Puget Soundkeeper All. v. Dep't of Ecology,* No. 84492-0-I (Wash. Ct. App. Sept. 5, 2023) (slip op.).

IV. REASONS WHY REVIEW SHOULD BE DENIED

A. The Court of Appeals' Conclusion That the Permits Require Compliance with State and Federal Law Does Not Conflict with Any Published Decisions

The Court of Appeals correctly concluded that Condition S4 of the Permits prohibits discharges that violate water quality standards, requires the reduction of pollutants to the MEP, and requires the use of AKART to prevent stormwater pollution. Slip op. at 24–25. As discussed above, under Condition S5, permittees are required to develop stormwater management programs to control stormwater pollution to the levels required

by Condition S4. Soundkeeper argues that the Court of Appeals erred in concluding that the Permits meet federal and state requirements because, according to Soundkeeper, every part of a permit needs to individually meet these requirements. Petition at 21–22. However, the Court's decision is entirely consistent with *Washington State Dairy Federation v. Department of Ecology,* 18 Wn. App. 2d 259, 490 P.3d 290 (2021), and *Puget Soundkeeper Alliance v. Department of Ecology,* 102 Wn. App. 783, 9 P.3d 892 (2000).

In *Soundkeeper,* the Court rejected the same argument Soundkeeper advances here, that the Court was required to focus on a specific permit condition to determine if the permit complied with the AKART requirement. *Soundkeeper,* 102 Wn. App. at 785. Instead, the Court evaluated the permit as a whole and properly concluded Ecology had satisfied the AKART requirement by a combination of conditions in the permit. *Id.*

The decision below does not conflict with *Dairy Federation,* because both cases focused on whether the permits at issue properly regulated pollutant sources in a manner that complied with state and federal water pollution control requirements. In *Dairy Federation,* the Court concluded Ecology had failed to comply with AKART for two of the pollutant sources regulated by the permit—manure storage lagoons, and composting areas. *Dairy Fed'n,* 18 Wn. App. 2d at 276–88. The Court also held that the sections of the permit that addressed pollution from animal pens and corrals did satisfy AKART requirements. *Id.* at 284–85.

The Court's analysis in *Dairy Federation,* like the Court's analysis in this case, focused on the sections of the permit that regulate pollutant *sources*. For the permits at issue in *Dairy Federation,* Ecology drafted separate sections of the permits with separate requirements to address different pollutant sources, and the Court properly focused its analysis on how Ecology regulated the different pollutant sources to

determine if each source of pollution complied with AKART. *Id.* at 276–88. By contrast, the municipal stormwater permits at issue here require permittees to develop a stormwater management program to implement AKART, MEP, and compliance with water quality standards for all pollutant sources, and relies on Condition S4 where water quality violations occur despite compliance with the stormwater management program developed under Condition S5. Slip op. at 6–8. The decision below does not conflict with *Dairy Federation* because both cases evaluated whether the permits at issue properly regulated pollutant sources in a manner that complied with water pollution control requirements.

B. The Permits Do Not Authorize Discharges That Cause or Contribute To Violations of Water Quality Standards

Soundkeeper fails to cite any evidence in the record to support its allegation that the Permits authorize stormwater discharges that cause or contribute to violations of water quality standards. Petition at 24. In fact, Condition S4.B specifically

provides that the Permits do not authorize discharges that violate water quality standards, and the Stormwater Management Program required by Condition S5 "is a set of actions and activities designed to protect water quality." AR 2055.

Soundkeeper relies on the fact that waterbodies continue to violate water quality standards to support its argument that the municipal stormwater permits authorize discharges that cause and contribute to water quality violations. Petition at 24. But Soundkeeper failed to make the evidentiary connection between these water quality impairments and the discharges authorized by the Permits. Urban waterbodies in particular are impacted by numerous pollution sources and simply noting the existence of impaired waterbodies does not demonstrate that the discharges authorized by the Permits are causing or contributing to the impairment. Accordingly, as the Board properly concluded, the fact that streams are water quality

impaired does not establish that the impairment is due to stormwater discharges regulated by the Permits. AR 2066.

As discussed above, the Stormwater Management Plan required by Condition S5 establishes the pollution control requirements to protect water quality. Consistent with WAC 173-201A-510(3)(b), if a violation of water quality standards occurs despite implementation of the Stormwater Management Program, Ecology can use Condition S4 to require additional pollution control requirements as necessary to achieve compliance with standards. The Court of Appeals did not conclude that Ecology has discretion to allow stormwater to cause or contribute to violations of water quality standards, as alleged by Soundkeeper. Petition at 24. Rather, the Court properly held that Condition S4 "mirrors" WAC 173-201A-510(3)(b) by establishing the pathway Ecology uses to require additional pollution control requirements if a discharge violates water quality standards despite implementation of the required stormwater management program. Slip op. at 35. The Permits

do not authorize discharges that violate water quality standards. In fact, they establish a pathway to address specific discharges that do violate water quality standards. Soundkeeper has not established that this involves an issue of substantial public interest that should be decided by this Court.

C. Soundkeeper Waived the Argument That the Permits Are Self Regulating by Not Raising It Below and the Argument Is Without Merit in Any Event

Soundkeeper argues the Court should accept review because the Permits are allegedly "self-regulating." Petition at 26. However, Soundkeeper did not raise this issue below and has therefore waived it. RAP 2.5(a). Soundkeeper's failure to raise this argument below is likely because the argument lacks merit.

Condition S5.B requires that the Stormwater Management Program "shall be designed to reduce the discharge of pollutants . . . to the MEP, meet state AKART requirements, and protect water quality." AR 891. Condition S5 includes 25 pages of detailed and prescriptive requirements

that must be included in the Stormwater Management Program to ensure that the Program reduces pollutants as required by state and federal law. AR 891–915. Where a violation of a water quality standard occurs despite implementation of the stormwater management program, Condition S4.F authorizes Ecology to require the development of an adaptive management response to address the violation and the adaptive management response is subject to Ecology's review and approval. AR 889 The adaptive management approach is triggered whenever Ecology determines that a discharge is causing or contributing to a violation of water quality standards. AR 888–89. Ecology's determination can be based on notification from a permittee regarding a water quality violation or "through any other means." AR 888. In other words, a permittee, Ecology, or a member of the public can trigger an adaptive management response. Once an adaptive management response is triggered, Ecology decides whether the response is adequate. This is not the type of "hands-off

permittee-driven approach" that allows a permittee to "do nothing more than decide for itself what reductions were necessary" that was found to be an improper self-regulating approach in *Environmental Defense Center v. U.S. EPA,* 344 F.3d 832 (9th Cir. 2003). Petition at 26–27. Rather, Ecology determines what pollution control requirements must be included in a stormwater management program, and Ecology determines what additional pollution control requirements are necessary to address any discharges that cause water quality violations. The Permits are not self-regulating, and the fact that Soundkeeper elected not to raise this issue below demonstrates that it is not an issue of substantial public interest that should be decided by this Court.

V. CONCLUSION

For the reasons stated above, Ecology respectfully requests that the Court deny Soundkeeper's Petition for Review.

This document contains 4,415 words, excluding the parts of the document exempted from the word count by RAP 18.17.

RESPECTFULLY SUBMITTED this 3rd day of November, 2023.

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CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the state of Washington that on November 3, 2023, I caused to be served the foregoing document in the above-captioned matter upon the parties herein via the Appellate Court Portal filing system, which will send electronic notifications of such filing to the registered parties.

DATED this 3rd day of November, 2023, in Olympia, Washington.

s/ Ronald L. Lavigne
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ATTORNEY GENERAL'S OFFICE - ECOLOGY DIVISION

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