



February 4, 2019

Mr. Foroozan Labib
Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

Dear Mr. Labib:

WSDOT appreciates the opportunity to comment on the public review draft of the 2019 *Washington State Department of Transportation National Pollutant Discharge Elimination System and State Waste Discharge Municipal Stormwater General Permit (Permit) and Fact Sheet*. Our comments are attached and include one table with comments on the draft Permit and one table with comments on the Fact Sheet.

While several of the comments on the draft Permit address typographical or grammatical errors, WSDOT would like to highlight the following comments, described in more detail in the attached table, requesting important clarifications:

1. Additional wording is needed in S1.B.1. to clarify that the Permit coverage area is based on the Phase I and II Permit coverage areas on date that those permits are issued, and does not change over the permit term (except when the 2019 Phase I and II Permits are issued). This clarification is needed because the Phase I and II Permits coverage areas may change over time due to jurisdictions' annexations or Phase I and II Permit modifications during this Permit's term. Additionally, any references within the Permit to the coverage area should reference S1.B.1. instead of "Phase I and II Permit coverage areas."
2. Wording throughout the Permit must be consistent in stating the compliance expectations for TMDLs are fully described in Appendix 3. Additionally, any references to compliance expectations for TMDLs should reference Appendix 3 and/or S1.B.2. instead of "applicable TMDL areas."
3. Additional wording is needed to clarify that Appendix 1 describes Highway Runoff Manual equivalency, similar to Appendix 10 of the Phase I Permit, rather than incorporating the manual in the Permit. Also needed is wording that specifies which

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sections of the Highway Runoff Manual are requirements making it functionally equivalent to the required portions of Ecology's Stormwater Management Manuals.

Our detailed comments with proposed resolutions are included in two attachments, a table with comments regarding the draft Permit and a table with comments regarding the Fact Sheet.

Please let me know if you have any questions or if you would like to discuss any of these comments.

Sincerely,



Megan White, P.E.

Acting Director, Development Division

State Design Engineer

MW:sp

Enclosure