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The permit designates the stormwater systems within WSDOT's control as "Municipal Separate Storm Sewer System (MS4)". This is fundamentally flawed since WSDOT is not a municipal corporation at all. They say they are "The Washington State Department of Transportation is the steward of a multimodal transportation system and responsible for ensuring that people and goods move safely and efficiently. In addition to building, maintaining, and operating the state highway system, WSDOT is responsible for the state ferry system, and works in partnership with others to maintain and improve local roads, railroads and airports, as well as to support alternatives to driving, such as public transportation, bicycles and pedestrian programs." AND THEY "Operates and maintains 18,600 lane miles of state highway; Owns, operates and maintains nearly 3,300 bridge structures; Runs the largest ferry system in the nation that moves 24.2 million passengers and 10 million vehicles a year; Partners with 31 public transportation systems to provide more than 220 million passenger trips a year; Owns three Talgo train sets in the Amtrak Cascades fleet and manages the Palouse River and Coulee City Rail system.

I suggest you name their system the Multimodal Transportation System's Separate Storm Sewer System (MTS5) to further differentiate their system from MS4 which they often connect AND discharge to directly. WSDOT is often the headwaters of the Stormwater network connected to local creeks, streams, rivers and the Puget Sound.