



April 12, 2023

Electronic Public Comments Submittal

**RE: Comments on the draft Whatcom Creek Bacteria Total Maximum Daily Load Study: Water Quality Improvement Report and Implementation Plan, Publication 23-10-013 (draft TMDL).**

Dear James Kardouni,

The Washington State Department of Transportation (WSDOT) seeks to work collaboratively with the Department of Ecology (Ecology) and other partners to improve water quality across the state. We appreciate your efforts to collaborate with WSDOT on the development of this TMDL and implementation plan.

**Draft TMDL comment and recommendation:**

1. (p. 62, Table 15)

Draft TMDL language: *Share IDDE and monitoring data with the City of Bellingham; notify Department of Public Works Stormwater manager if illicit discharges or exceedances that drain to physically interconnected stormwater systems (required)*

Comment: We appreciate the importance of sharing data with watershed partners. As written, this action doesn't acknowledge that the sharing of IDDE data has largely been automated based on existing permit requirements. If specific individuals wish to receive all WSDOT related IDDE notifications, they must be on the Washington State Patrol Spills Notification listserv and set up to receive notifications from Ecology's ERTS notification system. WSDOT does not own these notification systems but uses them to ensure appropriate notifications are made.

Recommendation: Consistent with the draft TMDL language for other municipal permittee actions, please include the words, "on request" in this action for monitoring data. Please also consider editing this action to acknowledge the automated procedures developed to meet IDDE notification requirements.

*Share ~~IDDE and~~ monitoring data with the City of Bellingham **on request**. Notify ~~Department of Public Works Stormwater manager~~ **the City of Bellingham** if illicit discharges or exceedances ~~that~~ drain to physically interconnected stormwater systems (required)*

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Thank you for considering our comments. If you have questions or wish to discuss these comments, please contact WSDOT's Statewide TMDL Lead, Elsa Pond, [ponde@wsdot.wa.gov](mailto:ponde@wsdot.wa.gov).

Sincerely,

A handwritten signature in black ink that reads "Tony Bush". The signature is written in a cursive, flowing style.

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