



September 2, 2025

Electronic Public Comments Submittal

**RE: Comments on the Drayton Harbor Bacteria Total Maximum Daily Load
Draft: Technical Study and Water Quality Improvement Plan, Publication 25-
10-060 (draft TMDL)**

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.

Comments and recommendations:

1. (p. 79, first bullet) “Participate in watershed planning and TMDL development where WSDOT identifies itself as a key interested party”

Comment: The language, “where WSDOT identifies itself as a key interested party” does not reflect a permit requirement and is misleading. S5.C.2 of the WSDOT Municipal Stormwater Permit requires WSDOT’s Stormwater Management Program (SWMP) Plan to include “coordination mechanisms among entities covered under a municipal stormwater NPDES permit to encourage coordinated stormwater-related policies, programs, and projects within a watershed.”

Recommendation: Delete the language “where WSDOT identifies itself as a key interested party”. Instead, the bullet could be enhanced by speaking to our coordination requirements noted above or alternatively, additional bullets could be added that point to other permit requirements that could potentially support bacteria reduction goals, such as maintenance, stormwater retrofits, or monitoring and research.

Thank you for considering these comments and the proactive collaboration prior to releasing the draft TMDL. If you have questions or wish to discuss these comments, please contact WSDOT’s Statewide TMDL Lead, Elsa Pond, elsa.pond@wsdot.wa.gov.

Sincerely,

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

Tony Bush
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