



October 2, 2025

Electronic Public Comments Submittal

RE: Comments on the Draft Soos Creek Total Maximum Daily Load for Fine Sediment: Water Quality Improvement Report and Implementation Plan, Publication 25-10-072 (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. 103, first sentences of first two paragraphs) “The Washington State Department of Transportation (WSDOT) Water Quality Program provides guidance and technical support to road planning, design, construction, and maintenance of state transportation projects.”...“To achieve compliance with the federal Clean Water Act and State water quality laws, WSDOT prepares stormwater pollution prevention plans for major road projects, prepares annual NPDES compliance reports and plans, conducts mitigation stream restoration projects, and monitors water quality.”

Comment: The first sentence of the first paragraph is incorrect. The WSDOT does not have a Water Quality Program. The WSDOT has an Environmental Services Office with a Stormwater Branch that works closely with other agency divisions and programs to provide guidance and technical support. The first sentence of the second paragraph does not successfully characterize what WSDOT does to comply with the Clean Water Act and state water quality laws.

Recommendation: Use language to describe WSDOT from an existing TMDL, such as the Pilchuck River Temperature and Dissolved Oxygen, Budd Inlet Dissolved Oxygen, or Padilla Bay Bacteria, TMDLs. If these existing examples miss the mark, it may be beneficial for WSDOT and Ecology to develop template language for TMDL clarity and consistency.

2. (p. 110) “One of the early actions expected from this TMDL is the development of a Stormwater Implementation Plan that each jurisdiction will use to assess a baseline condition for existing stormwater management controls and to identify where BMPs are necessary.”

Comment: We appreciate the value such an effort could provide, but it's not clear what level of resources this will take and how this could impact our existing priorities statewide, many of which are based on mandates such as Complete Streets or transportation funding packages such as Move Ahead Washington.

Recommendation: As noted in the Timeline section beginning on page 115, we appreciate that clarity on implementation is expected to be gained as permit requirements are developed. We do believe that our existing priorities support the goals of this TMDL and look forward to constructive coordination.

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,

A handwritten signature in cursive script that reads "Tony Bush".

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