

King County Water and Land Resources Division (Zack Holt)

Please refer to attached letter for comments. Thank you for the opportunity to provide comments.



King County

Water and Land Resources Division

Department of Natural Resources and Parks

King Street Center

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Seattle, WA 98104-3855

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TTY Relay: 711

August 21, 2026

Foroozan Labib

Washington State Department of Ecology

Water Quality Program

PO Box 47696

Olympia, WA 98504-7696

RE: Comments Regarding the Draft 2026 WSDOT Municipal General Permit

Dear Foroozan Labib:

King County's Water and Land Resources Division (WLRD) supports the Washington State Department of Ecology's efforts to improve water quality in Washington State through the NPDES permitting process and appreciates the opportunity to comment on the Draft 2026 WSDOT Municipal General Permit (Draft Permit).

WLRD safeguards King County's water and land resources by providing services that protect public health and safety and yield significant environmental benefits. WLRD provides flood control services, stormwater management, and other natural resource management services throughout the county. WLRD manages the stormwater program for unincorporated areas, houses three salmon recovery forums, restores habitat, monitors water quality, and controls noxious weeds. Additionally, WLRD operates King County's Environmental Lab and Science sections, which provide environmental monitoring, data analysis, and management and modeling services to partners, jurisdictions, and residents throughout the region.

WLRD understands the importance of addressing water quality issues in Washington State and improving environmental health overall within our region. WLRD has reviewed the Draft 2026 WSDOT Municipal General Permit and has the following comments:

S5.C.6.a.iv Stormwater Retrofits for Existing Highways (our SMED equivalent). Draft Permit states: *"WSDOT shall consider a watershed approach to identify high priority highway segments and distribute retrofit projects geographically across WSDOT regions."*

Foroozan Labib
August 21, 2026
Page 2

Comment: Please define “watershed approach” or provide context for this statement. The Draft Permit should encourage cooperation with other jurisdictional efforts and encourage partnering on larger scale regional facility opportunities to maximize benefits and build on existing efforts. The Draft Permit should encourage WSDOT to assess efforts underway by Phase I and II permittees and leverage such projects effectively.

S5.C.6.b.i-iv. Standalone stormwater retrofit projects. Draft permit states: *“Implement standalone stormwater retrofit projects that manage stormwater from 40 equivalent acres of existing PGIS as determined in Appendix 6.”* AND *“Circumstances beyond WSDOT’s control include limitations on funding, delay of permit approvals, emergencies or other unexpected project implementation delays. If these circumstances exist within this permit cycle, WSDOT shall document and report the circumstances, how they were beyond WSDOT’s control, and at a minimum complete project planning for prioritized highway segments totaling \$20 million or 40 equivalent acres of PGIS managed by stormwater retrofits.”*

Comment: The amount of infrastructure owned/operated by WSDOT is comparable to that of Phase I permittees. It appears there are more stringent requirements for Phase I permittee's than for WSDOT to meet the respective permit goals. Please consider adjusting language in the WSDOT requirements so they have the same or similar target requirements as Phase I permittees. In addition, does this 40 acre/\$20 million dollar requirement align with the previous study conducted by Puget Soundkeeper’s Alliance regarding the Structural Stormwater Control (SSC) program (the SSC was the former Phase I Stormwater Management for Existing Development (SMED) program) on cost vs retrofit implementation? Lastly, there is no “circumstances beyond (permittees) control” language in the Phase I permit for SMED requirements. Please provide clarification for why WSDOT allowed this accommodation and not other permittees.

S5.C.7.e. Maintenance (street sweeping). Draft permit states: *“...WSDOT shall develop and implement a street sweeping program to focus on high priority areas...”* *“Priority areas: Apply street sweeping program to: highways with AADT of 30,000 or greater.”*

Comment: Though it appears literature is limited on this, it can be assumed tire wear particles persist in highways with AADT less than 30,000. King County has been monitoring 6PPDQ (a component of Tire Wear Particles (TWPs) in road runoff with AADT <30,000 and we are finding levels that are 10-100 times in exceedance of the WA Water Quality Standard. We believe the type of vehicle use (truck routes, industrial area intersection, etc.) may have an effect on TWP concentrations in addition to AADT. Please provide clarification for why this number has been chosen and why it is prioritized over choosing highways with high ratios of stream/surface water intersection. It is unclear in this Draft Permit if WSDOT has any requirement to manage TWPs with sweeping on highways with lower AADT values.

Foroozan Labib
August 21, 2026
Page 3

5.C.8 Education, Training and Public Involvement.

Comment: Consider sharing information with the public via the WSDOT Education and Outreach program relating to Puget Sound Starts Here, Clean Car Care, and other outreach campaigns via the WSDOT Education and Outreach program or consider partnering with the STORM program to align messaging efforts.

S6. TMDL. Appendix 3 includes a new TMDL requirement for the Soos Creek watershed. (*“Report on swept areas and amount of TSS removed according to reporting requirements in S8”*)

Comment: The Draft Permit requires WSDOT report on Total Suspended Solids (TSS) for the Soos TMDL. TSS is an aqueous measurement for a sample collected from an aqueous media (stormwater, streams, lakes, etc.). Using TSS as a metric for solids collected by sweeping may not be appropriate.

Definitions section. There is no definition of maintenance in this section, yet the term is used throughout the document. Please consider adding a definition of maintenance to the Draft Permit.

General Comment. WLRD has reviewed comments submitted by Seattle Public Utilities (SPU) regarding this draft permit. WLRD agrees with and requests Ecology to consider the comments submitted by SPU to better align this permit with the Phase I permits and to encourage better coordination between WSDOT and Phase I permittees.

If you have questions regarding the comments above, please feel free to contact Zack Holt at zholt@kingcounty.gov.

Sincerely,

Signed by:

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Josh Baldi
Division Director

Enclosure

cc: Krista Camenzind, Deputy Director, Water and Land Resources Division (WLRD),
Department of Natural Resources and Parks (DNRP)
Ashley Evans, Policy and Government Relations Manager, WLRD, DNRP
Angela Gallardo, Stormwater Services Section (SWSS) Manager, WLRD, DNRP
Zack Holt, Environmental Programs Managing Supervisor, SWSS, WLRD, DNRP