

City of Renton (Kristina Lowthian)

Thank you for the opportunity to provide comments on the draft Washington Department of Transportation Municipal Stormwater General Permit.

Permit section S1.B.2 seems to exclude WSDOT responsibility for their portion of the MS4 described in S1.B.1 based on the last sentence, "For TMDL areas that are not within the areas described in S1.B.1 above WSDOT is responsible for the TMDL implementation actions found in Appendix 3." Given this language, WSDOT is not responsible for TMDL implementation actions for any MS4 it owns or operates in the areas described in S1.B.1. WSDOT should be responsible for MS4 systems it owns or operates in its permit coverage area. We recommend removing the first part of the last sentence of S1.B.2 so it reads: "WSDOT is responsible for the TMDL implementation actions found in Appendix 3."

Appendix 3: 15.b. City of Seattle's street sweeping water quality effectiveness study (<https://www.herrerainc.com/wp-content/uploads/2025/07/SPU-NPDES-effectiveness-study.pdf>) found an increase in sediment concentrations for the finest particles and did not report on sediment concentrations between 3.9-250µm (Table 1 on pg. 9). The results indicate that street sweeping may cause an increase in sediments that remain suspended potentially causing other water quality problems. We recommend further study of street sweeping before requiring it for TMDL implementation.

If section 15.b. of Appendix 3 is not removed based on the previous street sweeping comment, we recommend amendments to the final sentence which reads, "Report on swept areas and amount of TSS removed according to reporting requirements in S8 starting with the 2029 Annual Report." What is to be reported on for swept areas? Sweeping in dry weather is best practice and it's unclear as to how WSDOT is expected to measure TSS from swept dry solids which are not suspended. We recommend that the reporting requirements be feasible and provide useful information to Ecology.