



King County

Water and Land Resources Division

Department of Natural Resources and Parks

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January 10, 2014

Foroozan Labib
Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

RE: Comments on the Draft Washington State Department of Transportation (WSDOT) National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge Municipal Stormwater General Permit Issued for Review on November 6, 2013

Dear Mr. Labib:

The King County Department of Natural Resources and Parks and the King County Department of Transportation reviewed the above-referenced draft issued for comment on November 6, 2013. We appreciate the opportunity to review the draft and comment on the proposed changes. The pertinent comments and suggestions are listed below.

- In the WSDOT Permit, page 41, Appendix 2, 'Reportable Performance Indicators' SWMPP Reference Table 7-1: King County strongly supports the common sense approach of allowing the conducting of 95 percent of the planned inspections to meet permit requirements. King County sought to have these conditions placed in the Phase I permit for both inspections and maintenance requirements, which would reduce the G20 reporting on *de minimus* inspection and maintenance shortfalls and would have no appreciable reduction in environmental protection.
- In the WSDOT Permit, Appendix 5, page 6-5, Table 6-1: This item identifies "summer spawning areas" as a prioritization criterion and refers specifically to "summer chum and summer steelhead." These fish do not spawn in summer. They do return to natal streams in summer and spawn in September-October (chum) or January-May (steelhead). Consider revising the rationale column to read "Spawning areas, and summer holding and migration areas provide critically important habitat for summer chum and summer steelhead."
- In the WSDOT Permit, on page 30, G10, 'Removed Substances:' Disposal of decant for street waste vehicles must be in alignment with local jurisdictions requirements. For example, King County does not allow the disposal of decant liquids back into the MS4.

- In the WSDOT Permit, page 34, 'Definitions and Acronyms,' Consistency among various NPDES municipal stormwater permits is critical for regional collaboration and coordination. It facilitates effective implementation of stormwater management within Washington State. King County strongly encourages that any settlement on definitions of outfalls, discharge points, and receiving waters be included and applied to all three municipal stormwater permits, Phase I, Phase II, and the WSDOT.

The following *eratta* were observed during our review:

- In the WSDOT Permit, on page 7, 'Compliance with Standards,' S4.F.1, line 5: Identify is misspelled.
- In the WSDOT Permit, on page 12, 'Baseline Monitoring,' s7.B.5.a.i, line 3: The code citation "S7.B.6.b" is incorrect. It should read "S7.B.5.b."
- In the WSDOT Permit, on page 24, 'Reporting requirements,' s8.G.3, line 1: 'shall enter' is repeated.

Once again, we would like to express our thanks and appreciation for the opportunity to review this draft language and offer our feedback. We look forward to working with you on the implementation of this permit in a way that provides protection to the environment, using solutions that are effective and attainable by our programs.

Sincerely,



Douglas D. Navetski
Environmental Programs Managing Supervisor
Water Quality Compliance Unit
Stormwater Services Section

DN:JC:bgD08

cc: Larry Schaffner, Stormwater Program Coordinator and Policy Advisor,
Washington State Department of Transportation (WSDOT)
Stephen Conroy, Environmental Scientist III, WSDOT
Curt Crawford, P.E., Stormwater Services Section Manager, Water and Land
Resources Division, King County Department of Natural Resources and Parks