



December 13, 2013

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

RE: Stormwater Work Group Comments on Draft NPDES Municipal Stormwater Permit for WSDOT

Dear Mr. Labib:

On September 30, 2013, the Stormwater Work Group (SWG) sent the Department of Ecology (Ecology) and the Puget Sound Partnership a set of five recommendations for stormwater monitoring associated with Puget Sound roads and highways (Attachment A). The first three recommendations concerned broad monitoring needs for roads and highways and the last two applied to the Washington State Department of Transportation's (WSDOT) role in implementing regional monitoring via effectiveness studies and participation in Puget Sound status and trends monitoring. On November 7, Ecology released the draft National Pollutant and Discharge Elimination System (NPDES) municipal stormwater permit for WSDOT for public comment through January 10, 2014. This letter conveys the SWG's comments on the draft language in Special Condition S7 Monitoring.

The SWG thanks Ecology for considering our recommendations when developing WSDOT's draft permit monitoring requirements. The SWG is pleased that the draft language follows the recommendation that WSDOT continue and complete current permit-required studies, apply findings to their stormwater management program, and include the SWG in the process of identifying future permit-required studies. The SWG is also pleased that the draft language follows the recommendation that WSDOT participate in status and trends monitoring in Puget Sound as part of the Regional Stormwater Monitoring Program (RSMP).

The SWG has two specific comments and suggestions for improving the draft language in S7.E on p. 21:

1. The SWG recommends that WSDOT be required to notify Ecology which status and trends monitoring option they have selected no later than mid-summer, 2014. The draft October 5, 2014 deadline for WSDOT to notify Ecology which status and trends monitoring option they have selected will make WSDOT's participation in the RSMP more challenging to include in RSMP planning and implementation.

2. The SWG recommends that Ecology edit the language in WSDOT's second status and trends monitoring option (S7.E.2) to clarify whether an acceptable means by which WSDOT may implement this monitoring option would be to join the RSMP's coordinated effort to collect and analyze these samples; i.e., to provide the RSMP with funding for these additional samples and analyses. Multiple members of the SWG interpret the current draft language for this option as requiring WSDOT to send its own field crews. We believe this would be unnecessary and inefficient and would like for WSDOT to have the opportunity to seriously consider this option for RSMP participation.

If you have any questions about our comments, please feel free to contact me at 206-477-4825 or SWG staff member Karen Dinicola at 360-584-7052.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Simmonds".

Jim Simmonds, Chair
PSEMP Stormwater Work Group

Attachment

Attachment A

SWG recommendations for stormwater monitoring related to roads and highways, included in a letter from J. Simmonds to B. Moore and K. Dzinbal, September 30, 2013

Recommendations for an overarching strategy for monitoring stormwater runoff from roads and highways:

1. It is important to conduct the following types of studies related to transportation systems. An updated literature review should inform study designs.
 - a. Effectiveness studies:
 - i. Evaluate stormwater treatment performance of modified vegetated filter strips.
 - ii. Evaluate the effectiveness of roadside ditch water quality enhancements for pollutant removal from rural roads.
 - iii. Evaluate the water quality treatment benefits of porous asphalt on road shoulders, rest stops, park and rides, and ferry terminals, and the optimization of its performance through operations and maintenance.
 - iv. Evaluate the use of compost-amended biofiltration swales to reduce pollutant concentrations at road maintenance yards.
 - v. Evaluate stormwater best management practice (BMP) performance in ultra-urban settings.
 - b. Source identification, diagnostic, and source control studies:
 - i. Identify and characterize stormwater pollutant hotspots in roads and highways.
 - ii. Test for the levels of polychlorinated biphenyl compounds (PCBs) in motor oils and fuels.
2. It is important to consider the attached list of parameters in designing studies related to runoff from roads and highways. This list will be added to our framework and strategy for the Stormwater Assessment and Monitoring Program for Puget Sound (SWAMPPS).
3. A statewide workshop focused on monitoring and research related to runoff from roads and highways should be convened annually. To the greatest extent possible, the workshops should be coordinated with other stormwater monitoring topics of interest.

Recommendations for monitoring requirements in the next WSDOT permit:

4. As part of the requirements of the next permit WSDOT should continue and complete current permit-required studies, and apply findings to their stormwater management program. The Stormwater Work Group would like to participate in the process of identifying future permit-required studies.
5. WSDOT should participate in Status and Trends monitoring in Puget Sound as part of the Regional Stormwater Monitoring Program (RSMP).