



March 14, 2007

Ms. Nancy L. Winters, Manager
Program Development Services, Water Quality Program
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

RE: Highway Runoff Manual Consistency Review

Dear Ms. Winters:

The Washington State Department of Transportation (WSDOT) has assessed the Washington State Department of Ecology's (Ecology) February 16, 2007 comments regarding its review of the 2006 update of the Highway Runoff Manual (HRM). To support efforts to collaboratively work to resolve the remaining discrepancies, the status report below describes how WSDOT intends to address the eleven items Ecology identified as requiring revision to achieve equivalency with Ecology's stormwater management manuals (i.e., the February 2005 Stormwater Management Manual for Western Washington and the 2004 Stormwater Management Manual for Eastern Washington).

1. As has been communicated to Ecology previously, WSDOT is looking to the NPDES municipal permit development process for resolution of the discrepancy related to the SMMWW's forested presumption standard.
2. As has been communicated to Ecology previously, WSDOT is looking to the NPDES municipal permit development process for resolution of the discrepancy related to the SMMWW's and SMMEW's ADT threshold for enhanced treatment.
3. As has been communicated to Ecology previously, WSDOT is looking to the NPDES municipal permit development process for resolution of the discrepancy related to the SMMEW's ADT threshold for oil control. However, WSDOT would like to obtain a list of BMPs that Ecology considers having "absorptive surfaces for inclusion in the HRM's oil control menu of BMP options.

(Note: In regard to the above three issues, WSDOT regions and project teams are being advised of Ecology positions on them and are being provided information such that they can manage risk associated with those projects that require Ecology permits and 401 certifications.)

4. The edit to the last line of page 3-11 will be made per Ecology's direction.
5. The *White Salmon River* is on the Ecology-approved list that was generated by the Herrera/NHC consultant team (see attached documentation). *Burg Sough* will be removed per Ecology direction as we could not find any supporting documentation for its inclusion.
6. Edits to Table 3-7 on page 3-25 will be made per Ecology's direction to read as follows:

Size facility to infiltrate ~~the entire sufficient runoff volumes of that the overflow~~ does not exceed the 25-year peak flow requirement. ~~storm with an overflow,~~ and ~~e~~Check the 100-year peak flow to estimate the potential for downstream property damage, or infiltrate 100 % of the ~~storm~~100-year runoff volume.

Edits to Figure 4-5 will be made per Ecology's direction to be consistent with the above edits.

7. Edit to page 5-38, *Design Method, Step 1* will be made per Ecology's direction.
8. As explained in Section 5-3-6 of the HRM, several Ecology-approved BMPs are not included in the manual because WSDOT does not consider them viable for widespread highway application due to cost considerations associated with their maintenance. However, the HRM goes on to explain that these BMPs are possible options, but they require region Hydraulics and Maintenance Superintendent approval to authorize their use.
9. The sentence referenced in the HRM will be deleted as any infiltration benefits that may exist would be a function of the properties of the underlying soils and should be modeled as such.
10. WSDOT will reserve comment until it has received and had an opportunity to review Ecology's discussion memo.
11. The edit will be made per Ecology's direction.

WSDOT also acknowledges that it must obtain Ecology's approval for changes to the HRM associated with post-publication updates related to the manual's minimum requirements, design criteria and tools, and BMP maintenance standards. However, we presume that such formal approvals would not be necessary: 1) to rectify typographical, grammatical, and web

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link errors, 2) to adjust formatting and layout to enhance readability, 3) to enhance content clarity, and 4) for content that is clearly outside the scope of Ecology's manuals, but included in the HRM for operational efficiency reasons (e.g., the ESA-checklist, BMP validation and cost-effectiveness procedures, internal procedures for seeking approval for alternative BMP options, etc.).

If you have further questions and/or concerns please contact Larry Schaffner at (306) 570-6657.

Sincerely,

Kenneth M. Stone
Resource Programs Branch Manager
Environmental Services Office

Attachment

100 mile points that pass

09.07.2004

Preliminary data

Herrera Environmental Consultants and NHC

River name	Closest town	Description	Longitude	Latitude	LCC	Mainstem	WRIA Number	WRIA Name
Baker River	Concrete	Baker River/Baker Lake at Noisy Creek	-121.60121597902	48.73139521308	9.8	Skagit	4	Upper Skagit
Bogachiel River	Forks	0.4 miles downstream of Dowans Creek	-124.33890495041	47.87594980444	17.0	Quillayute	20	Soleduc
Calawah River	Forks	At confluence with South Fork Calawah River	-124.33407536496	47.97086826860	22.5	Quillayute	20	Soleduc
Carbon River	Orting	At confluence with South Prairie Creek	-122.15555042904	47.09804977783	55.3	Puyallup	10	Puyallup-White
Cascade River	Darrington	Cascade River at Found Creek	-121.23592183985	48.48369844090	9.8	Skagit	4	Upper Skagit
Cedar River	North Bend	At confluence with Taylor Creek	-121.85337876200	47.39114722119	50.2	Cedar	8	Cedar-Sammamish
Cispus River	Randle	At confluence with Cat Creek	-121.62397731763	46.34914584596	24.0	Cowlitz	26	Cowlitz
Clearwater River	Tahola	At confluence with Christmas Creek	-124.22901767104	47.65456547871	6.2	Queets	21	Queets-Quinault
Coweman River	Kelso	At confluence with Gobble Creek	-122.79419822067	46.13273731139	36.7	Cowlitz	26	Cowlitz
Dickey River	Forks	At confluence with Coal Creek	-124.57754337008	47.94793975137	4.6	Quillayute	20	Soleduc
Dosewallips River	Poulsbo	At confluence with Rocky Brook	-122.94247042031	47.71632536222	2.3	Dosewallips	16	Skokomish-Dosewallips
East Fork Lewis River	Yacolt	At confluence with Big Tree Creek	-122.38728464753	45.83176084949	49.4	Lewis	27	Lewis
Elwha River	Port Angeles	At confluence with Goldie River	-123.46962444101	47.83951200610	1.0	Elwha	18	Elwha-Dungeness
Grays River	Cathlamet	At confluence with Hull Creek	-123.60893498081	46.35351039950	6.2	Grays	25	Grays/Elochoman
Green River (not King County)	Mossyrock	3.5 miles upstream of Devils Creek	-122.45285452862	46.37723668224	24.0	Cowlitz	26	Cowlitz
Hoh River	Forks	1.2 miles downstream of Jackson Creek	-123.91264777967	47.86116221206	8.4	Hoh	20	Soleduc
Kalama River	Kalama	2.0 miles downstream of Jacks Creek	-122.57087771122	46.04881874649	19.3	Kalama	27	Lewis
Lewis River	Randle	At confluence with Quartz Creek	-121.84674147038	46.17907612178	21.4	Lewis	27	Lewis
Lightning Creek	Concrete	Lightning Creek downstream of Three Fools Creek	-120.97422827415	48.89038877215	9.8	Skagit	4	Upper Skagit
Little White Salmon River	White Salmon	At confluence with Lava Creek	-121.62843197279	45.78142327115	2.2	Little White Salmon	29	Wind-White Salmon
Middle Fork Snoqualmie River	North Bend	At confluence with Rainy Creek	-121.54823917064	47.54181579190	31.7	Snohomish	7	Snohomish
Muddy River	Stevenson	At confluence with Clear Creek	-122.00570330097	46.11365161159	21.4	Lewis	27	Lewis
Naselle River	Long Beach	At confluence with Johnson Creek	-123.80846902919	46.37386762640	25.0	Naselle	24	Willapa
North Fork Nooksack	Deming	North Fork Nooksack at USGS gage 12205000, 0.25 miles downstream of Deadhorse	-121.84326378425	48.90528660738	28.4	Nooksack	1	Nooksack
North Fork Sauk River	Darrington	North Fork Sauk River at Bedal Campground	-121.38958811545	48.09645108932	9.8	Skagit	4	Upper Skagit
North Fork Skokomish River	Shelton	Confluence with McTaggart Creek	-123.23484690635	47.36272659704	3.8	Skokomish	16	Skokomish-Dosewallips
North Fork Stillaguamish River	Darrington	7.5 miles West of Darrington on SR530	-121.75655435322	48.28238358310	25.4	Stillaguamish	5	Stillaguamish
North Fork Toutle River	Mossyrock	At confluence with Hoffstadt Creek	-122.53065971437	46.33758429493	24.0	Cowlitz	26	Cowlitz
Ohanapecosh River	Packwood	At confluence with Summit Creek	-121.58138635423	46.69396696369	24.0	Cowlitz	26	Cowlitz
Puyallup River	Carbonado	Half mile downstream of confluence with Kellog Creek	-122.05620985825	46.92650353558	55.3	Puyallup	10	Puyallup-White
Queets River	Tahola	At confluence with Tshletshy Creek	-123.92462155834	47.66598337887	3.7	Queets	21	Queets-Quinault
Quinault River	Tahola	At confluence with North Fork Quinault River	-123.66721688723	47.54013372735	3.5	Quinault	21	Queets-Quinault
Ruby Creek	Concrete	Ruby Creek at SR-20 crossing D/S of Granite and Canyon Creek	-120.91765981427	48.70692149855	9.8	Skagit	4	Upper Skagit
Skagit	Hope, Canada	Canada, downstream of Snass Creek at Hwy 3, east of Hope	-121.06198791063	49.22131156457	9.8	Skagit	4	Upper Skagit
Skykomish River	Index	At Confluence with Lost Creek	-121.44488152208	47.88953585179	31.7	Snohomish	7	Snohomish
Sol duc River	Forks	At confluence of North and South Fork Soleduck River	-123.95493236426	48.04059708725	12.8	Quillayute	20	Soleduc
South Fork Nooksack	Lyman	South Fork Nooksack upstream of Skookum Creek fish hatchery	-122.14008355726	48.66959814908	28.4	Nooksack	1	Nooksack
South Fork Skokomish River	Shelton	At confluence with Vance Creek	-123.25376434454	47.31686309866	3.8	Skokomish	16	Skokomish-Dosewallips
South Fork Skykomish River	Skykomish	Confluence of Tye and Foss Rivers	-121.30658811234	47.70525966678	31.7	Snohomish	7	Snohomish
South Fork Stillaguamish River	Granite Falls	Confluence of Cranberry Creek and South Fork	-121.84388353735	48.10383573577	25.4	Stillaguamish	5	Stillaguamish
South Fork Toutle River	Mossyrock	At confluence with Thirteen Creek	-122.61782419304	46.26705079716	24.0	Cowlitz	26	Cowlitz
Suiattle River	Darrington	Suiattle River downstream of Milk Creek	-121.16375603224	48.22081032647	9.8	Skagit	4	Upper Skagit
Sultan River	Sultan	0.4 miles upstream of SR2	-121.82826445743	47.86294995097	31.7	Snohomish	7	Snohomish
Thunder Creek	Concrete	Thunder Creek downstream of Neve Creek and East of the Neve	-121.06434977215	48.65168683428	9.8	Skagit	4	Upper Skagit
Tilton River	Morton	At confluence with North Fork Tilton River	-122.35512391006	46.58295116763	24.0	Cowlitz	26	Cowlitz
White River	Enumclaw	At confluence with Huckleberry Creek	-121.58601113198	47.07918901137	55.3	Puyallup	10	Puyallup-White
White Salmon River	White Salmon	0.15 miles upstream of confluence with Trout Lake Creek	-121.50137552674	45.99583223840	19.0	White Salmon	29	Wind-White Salmon
Willapa River	Raymond	At confluence with Mill Creek	-123.64585276791	46.64822375597	54.6	Willapa	24	Willapa
Wind River	Stevenson	At confluence with Cold Creek	-121.94357604263	45.83855715584	2.7	Wind	29	Wind-White Salmon