

Charles Manning

The proposed permit adopts the 2019 Stormwater Management Manual for Western Washington. Volume III, p. 462 of the manual addresses "Inflow from Areas that Don't Require Flow Control" to flow control facilities, and states that "The performance of Flow Control BMPs can be compromised if the additional area, beyond the area that needs to be mitigated, is too large." This statement quoted from the manual is unsubstantiated, and no basis is provided in the manual for the limitation on additional inflow area to that which adds a maximum of 50% to the 100-year peak runoff to the un-detained target area runoff. In fact, it can be demonstrated using WWHM2012 that allowing additional inflow beyond the limitation specified in the manual can provide superior flow control compared to a facility sized for the target area only. The current standard should be reconsidered, and possibly suspended until the question can be investigated further. Information regarding WWHM2012 analyses that led to this conclusion is available on request.