

## Anonymous Anonymous

The proposed update in the road related projects threshold to now also include replaced hard surfaces in the evaluation should be considered impractical. This is especially the case when considering the current pavement maintenance definition which identifies replacement of an existing pavement roadway down to the gravel base course (without any expansion of the roadway) as a replaced hard surface and not a maintenance activity. Often it is not practical or an efficient use of public funds to grind and overlay only the top portion of existing pavement and subsequently the entire pavement layer is removed exposing the gravel base course. Changing the threshold to include replaced hard surfaces will significantly increase the cost of what by most is considered routine roadway maintenance and would ultimately reduce the frequency for when roadway maintenance is performed. Washington State roadways already rank near the bottom of the nation in performance (including pavement condition). Additionally, many urban roadway areas pose significant limitations to implementation of the current available runoff treatment options (limited space, grade, infiltration, etc.) and as such, widespread implementation of treatment as a component of a roadway re-surfacing project would often be impractical.