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The SWMMWW currently defines crushed gravel as an impervious surface. Contrary to this definition, the SWMMWW defines paving over gravel as a new impervious surface. During large rain events a significantly quantity of fine sediment often enters stormwater runoff from crushed gravel roadway/parking lot surfacing and results in pollution of stormwater. Current available treatment options are not very efficient at removal of this suspended fine sediment especially when considering the heavy sediment loading from the crushed gravel surfaces. As such pavement of such surfaces is thought to be one of the only appropriate source control BMPs for this significant sediment pollution. With this practice currently being defined as a new hard surface, implementation of this applicable source control BMP would often require incorporation of supplemental treatment and flow control system's with the project; significantly increasing cost and making implementation of this source control BMP impractical in many cases. While well intentioned, defining paving of an existing impermeable gravel surface as a new impermeable surface desensitizes paving of those surfaces resulting in ongoing pollution issues from them. The current definition disproportional impacts low income and disadvantaged communities for which gravel surfacing is common. For these reasons, it is requested that Ecology consider updating the manual to include paving over existing crushed gravel surfacing in the definition of a replaced impermeable surface and not a new impervious surface.