

Eric Dightman

Please give strong consideration to removing permeable pavement (PP) from your manual. I believe the permeable pavement is neither permeable nor pavement. I direct this comment toward asphalt and portland cement concrete permeable pavements. The voids in PP quickly clog with sediment. PP can't stand up to traffic loadings anywhere near as long as non-permeable pavement. I'm aware of events where PP will fail when a large truck turns its wheels on it. Even when PP does function as intended, it allows untreated stormwater to infiltrate into the ground.

A better alternative to PP would be to construct the same storage layer in the subgrade required by PP. Except the subgrade would then be paved with standard ACP or PCP. Runoff from these surfaces could be directed to a pre-settling or water quality feature before discharging to the storage layer beneath the pavement.

Thank you for considering my comment.