

City of Enumclaw

attached comments as sent to ECY's Construction and Industrial Stormwater General Permit intake team, and forwarded to A. Heye on 11/6/23.



OCT 31 2023

Administration Department

WATER QUALITY PROGRAM

October 23, 2023

Subject: Opposition to Proposed Rule - Draft 2024 Stormwater Management Manual for Western Washington

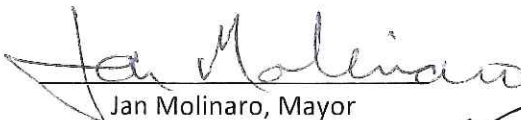
To Whom It May Concern:

The Washington State Department of Ecology is proposing a new rule in the 2024 Stormwater Management Manual for Western Washington relating to road projects. The draft rule requires road replacement projects greater than 5,000 ft² to add treatment facilities, and greater than 10,000 ft² to add flow control facilities to manage runoff (DRAFT 2024 SWMMWW).

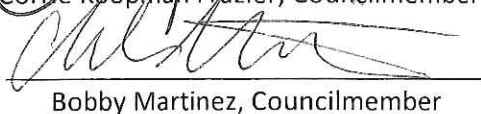
Implementation of this rule would have a substantial and disproportionate negative impact on the City of Enumclaw's ability to effectively maintain our road infrastructure. The cost of routine repairs for our streets would increase substantially, as the cost of the required stormwater facilities would be greater than the roadwork itself. This challenge would be exacerbated by the significant practical limitations to implementing this rule, such as space constraints and utility conflicts. These barriers make complying with the rule impractical, which will in effect only serve to limit the scope of our needed repair work. While Enumclaw and other cities would have road improvements hampered by this regulatory hurdle, cities located on the Puget Sound and other waterbodies exempt from the flow control requirements will not be affected to the same degree.

The City of Enumclaw is opposed to adding treatment and flow control facility requirements to road replacement projects as proposed in the draft 2024 Stormwater Management Manual for Western Washington. It would substantially impair our ability to maintain our roadway infrastructure and disproportionately impact many smaller municipalities such as ourselves. Thank you for your consideration.

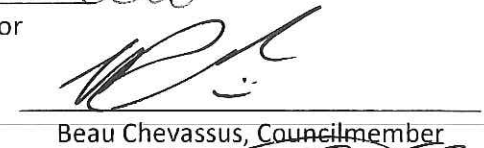
Regards,

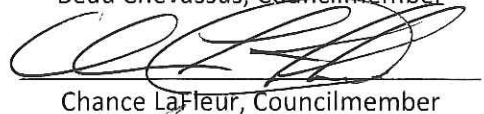

Jan Molinaro, Mayor


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