From:	David Harmsen
To:	ECY RE WW SW Manual Comments
Subject:	Conmments on draft 2012
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Section 2.5.5 Specifically Mandatory List #2. I see that permeable pavements are placed above bioretention in preference. Many of the conditions that would preclude permeable pavements also preclude bioretention. Therefore, it seems that bioretention will generally lose out to the permeable pavements. From a Small Owner standpoint, bioretention systems do not need specialists to install, provide better indication of maintenance needs because they are visible, and are easier to maintain on a regular basis. They also provide a known treatment function due to the control on the amended soil and are aesthetically pleasing to the eye.

Please consider placing the two on the same tier of choices.

Section 3.4 Specifically the number and timing of Pilot Infiltration Tests. The proposed number of PIT's is too high. The geotechnical engineer should be allowed to determine the number of tests based on the complexity of the underlying soils. If soils are similar in nature throughout the project, the number of tests should be reduced. There is no economic viability in the current proposal. The same with the requirement that a project wait through the winter to obtain winter high ground water measurements. Probably acceptable for large projects that have extended design and permitting, but smaller projects could be seriously impacted by this requirement with very little benefit as geotechs can usually identify the signs of high groundwater in the soil profile.

Not being a geotech myself, I would ask that you take the comments of many geotechnical engineers under serious thought and not just use a few outliers who appear to have an agenda.

General comment. It seems that much of this draft was worked together with no consideration of economic means. I heard at one of the public meetings that economic studies are in the works but that they would not change what is proposed. That is short sighted. You are demanding much of municipalities that are already reeling from loss of income while not providing any means of funding or staffing for them. The general population has shown an unwillingness to be taxed further to support government programs. Where once development provided funding for review staff, the general economy has dried up that source of funding and given some of the thought process behind this draft it likely will not be coming back soon.

Who will pay to implement?

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