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Subject: SWMMWW Comments
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Squeaky Wheels Bicycle Advocacy Group - Position Paper

Washington State Department of Ecology Draft Storm Water Manual - December 2011

The updated storm water manual should be changed to exempt the installation of bicycle facilities from any DOE requirements for water quality treatment and allow them to be used as a Low Impact Development (LID) credit. This should include the installation of linear paved facilities for bicycling that are parallel to, and contiguous with, roadway travel lanes, including, but not limited to, dedicated bicycle lanes, shoulders, wide curb lanes and "sharrows." Requiring water quality treatment for the installation of such bicycle facilities is an inappropriate regulation. The regulation will provide minimal to no treatment value, will kill many critical small safety improvements, will work against social justice and will work cross-purposes to DOE's own stated goals.

Bicycle facilities are critical for life-safety for all non-motorized commuters - school children, recreational riders, and anyone choosing an alternative to driving. This is important for public health and also for social justice for all demographic groups.

Bicycle facilities reduce net pollutant loads and net impervious surface as they support an alternative to driving and its associated impacts, therefore they should be treated as an LID element. The wash-on/blow-on argument is irrelevant to the surfacing type and therefore inappropriate to bicycle facilities. Bicycle facilities are important integrated elements for supporting light rail hubs and other mass transit options and require no parking lots. Funding for bicycle facilities is very limited; and water quality improvements will make bicycle facilities, particularly smaller spot safety improvements, unrealistically expensive and unfeasible.

Bicycle facilities, by definition, support pollution reducing behaviors and therefore reduce net pollutant loads. It is important for DOE to take a broader view to protect our water quality as well as the rest of our environment, and ensure safety for all.