

Comments on Washington DC Draft Storm Water Guidelines  
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1. Section 2.6, Hydrology Methods. During the training seminar, the comment was made that the Rational Method was not allowed. However, it is included in this section as an allowable method. If it is allowed, it should be clearly stated that it is only acceptable for drainage areas smaller than some specific value. I would recommend something like 5 or 10 acres as a maximum size for use of the Rational Method. It only calculates a peak flow and isn't very conducive to use for analysis of storage facilities or LID features.
2. Appendix A, Page A-5, Step 4. The instructions indicate that SA should be in acres. However, it should be in square feet.
3. Appendix A, Page A-5, Step 6. The TSS event mean concentration for lawn cover is shown as 602 mg/l. This is by far the largest TSS concentration, which would indicate the last thing you want to improve storm water quality is a lawn. While that might make some sense for nitrogen or phosphorus control, it seems to me that a lawn should have a pretty small TSS value. I would expect it would at least be similar to "landscaping".
4. Appendix H, Page H-4. The fourth bullet indicates that a separate hydrologic analysis is required for each sub-area, including Tc, RCN, soils and land use. This indicates to me that calculations for Tc and RCN are required. These calculations should only be required if the methods used require calculation of Tc and RCN. If SWMM is used, it does not calculate either of these values.
5. On the spreadsheet "Calculator-GeneralRetentionCompliance.xlsx", columns J through N are hidden. It appears these may be protected and I can't "unhide" them. While I understand the reason to keep cells from being changed, I would never use this spreadsheet for a calculation because I can't confirm how it calculates the Adjusted CN, and no other PE should use it without this information. Can you provide me with a spreadsheet that has these cells available for viewing, or instructions on how to show these cells? It may just be my limited knowledge of the use of Excel.