

Comments on DDOE's Stormwater Rule from DC Greenworks 20121105

Rulemaking:

Off-Site Retention options (2): needs to be specific and transparent with a template and online calculator for property owners, prospective buyers and sellers of property to determine the value of and costs for a subject property's stormwater management. Also recommend maintaining historical data of property values over time with costs of stormwater mitigation tracked. Adequate funding for additional staffing and hiring of consultants will be necessary.

- 1) Stormwater Retention Credits
 - a. Agree with this proposal
- 2) Payment of in-lieu fee
 - a. In-lieu fees should be set higher to encourage green BMPs as much as practicable.

Sites Draining into the Combined Sewer System: I agree with DDOE's recommendation for compliance without water quality treatment. This can be expected to encourage the use of green infrastructure technologies, especially green roofs.

Maintenance: It is critically important that it be performed and verified with onsite inspections. Recommend annual maintenance reports with soil/media testing and photographs.